Private Security Companies in the Caribbean

Case studies of St. Lucia, Trinidad and Tobago, and Jamaica
PRIVATE SECURITY COMPANIES IN THE CARIBBEAN

Case studies of St. Lucia, Trinidad and Tobago, and Jamaica
About this Publication
A joint project of the Institute of International Relations of The University of the West Indies and Project Ploughshares, this monograph contributes to the still limited published information on private security companies (PSC) in the Caribbean by presenting case studies on the private security industry in St. Lucia, Trinidad and Tobago, and Jamaica, as well as supporting chapters and appendices. The case studies were first presented at a roundtable held at The University of the West Indies at St. Augustine, Trinidad and Tobago, June 17-18, 2013, attended by public officials involved in PSC regulation and PSC industry representatives.

Acknowledgement
This work was carried out with the aid of a grant from the International Development Research Centre, Ottawa, Canada.

Institute of International Relations, The University of the West Indies
Located on the St. Augustine Campus of the University of the West Indies, in the Republic of Trinidad and Tobago, the Institute of International Relations is a centre for post-graduate study in international relations and diplomacy, for professional development and diplomatic training, and for critical policy analysis and debate.

Project Ploughshares
Project Ploughshares is the peace centre of The Canadian Council of Churches. Project Ploughshares works with churches, nongovernmental organizations, and governments, in Canada and abroad, to advance policies and actions that prevent war and armed violence and build peace. Project Ploughshares is affiliated with the Institute of Peace and Conflict Studies, Conrad Grebel University College, University of Waterloo.
Contents

Preface ................................................................................................................................. page 1
Acknowledgements ................................................................................................................ page 2
Acronyms and Abbreviations ................................................................................................... page 3
Introduction .............................................................................................................................. page 5

John Siebert

Private Security Companies in St. Lucia ................................................................................ page 13
Annita Montoute and Sheridon Hill

Private Security Companies in Trinidad and Tobago .......................................................... page 49
Matthew Louis Bishop

Private Security Companies in Jamaica ................................................................................ page 77
Kenneth Epps

Conclusion ............................................................................................................................... page 111
John Siebert

Review of Literature on Private Security Companies in the Caribbean ............................... page 121
Contributors ........................................................................................................................... page 137
Appendix 1: Recommendations ............................................................................................. page 138
Appendix 2: Case Study Questionnaires ................................................................................. page 141
A: Survey of Contract Private Security Companies
B: Research on Private Security Companies (PSCs) Interview Guide: Government Ministries
Preface

It gives me great pleasure, as Director of the Institute of International Relations (IIR) at The University of the West Indies, to commend Project Ploughshares for moving a bit out of its comfort zone to tackle, in collaboration with my colleagues at the Institute, an issue of growing importance to countries in the Caribbean. The spike in the number of private security companies in our region is really symptomatic of a larger global trend. The fact that the number of people employed in these private security companies (PSCs) is larger than the number of people employed in the police forces of countries in the English-speaking Caribbean speaks to a troubling trend in privatizing security services. Governments are having a difficult time guaranteeing zones of security for their people.

Academics at IIR see this as a post-Westphalian phenomenon. Since the signing of the Westphalian treaties in 1648 states have been the primary institutional agents responsible for the security of the people living within their sovereign borders. Today, that Westphalian system is coming to an end; globalization has made borders porous and the nature of security has changed. The studies in this report start with the premise of a post-Westphalian world in which private and public security actors sometimes jockey for position, sometimes supplement each other’s activities, and sometimes work in tandem to grapple with the multidimensional and interlinking elements of international and domestic security challenges.

The IIR is proud to have partnered with Project Ploughshares on this very important and cutting edge project, recognizing that this report would not have seen the light of day without the financial support of the International Development Research Centre (IDRC). We at the IIR hope to continue our collaboration with Project Ploughshares and the IDRC as we attempt to effect policy change in the regulation of PSCs, so that they work for, and not against, the human security interests of people in the Caribbean.

W. Andy Knight
Director, Institute of International Relations and
Professor of Political Science, on secondment from the University of Alberta

On behalf of Project Ploughshares I want to thank our colleagues at The University of the West Indies, at the St. Augustine campus in Trinidad and Tobago, for the opportunity to collaborate on this report on PSCs in the Caribbean. This project continues our decade-long engagement with civil society, academic, private sector, and government partners to advance human security and the control of small arms and lights weapons in the Caribbean.

The private security industry was not a focus of research and policy reform that Ploughshares had identified as a priority, but our Caribbean partners saw its significance. In the course of the research it became clear that strong regulation of PSCs by democratically controlled institutions can make a significant contribution to security and socioeconomic development in the Caribbean.

In addition to funding for this project, the IDRC provided invaluable advice on sharpening the research methodology and improving the final report. For this support we are most grateful.

John Siebert
Executive Director
Project Ploughshares
Acknowledgements

The case studies benefitted from advance circulation to participants of the “Private Security Companies in the Caribbean Policy Roundtable,” held at the Institute of International Relations, The University of the West Indies, St. Augustine Campus, Trinidad and Tobago, June 17-18, 2013. Roundtable participants included industry and government representatives from Jamaica, St. Lucia, and Trinidad and Tobago, as well as regional academic experts. Factual corrections, comments and suggestions prior to, and during, the roundtable are included in the final drafts.

The researchers extend their sincere thanks to all those who participated in the roundtable. As well, they would like to thank all the people who agreed to interviews or provided other essential information.

Kenneth Epps wishes to acknowledge desk research by Christina Woolner and field research by Maribel Gonzales and Tanisha Cunningham, both of which were important contributions to the Jamaica case study.
## Acronyms and Abbreviations

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Full Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>ASCOTT</td>
<td>Association of Security Companies of Trinidad and Tobago</td>
</tr>
<tr>
<td>ASIS</td>
<td>American Society of Industrial Security</td>
</tr>
<tr>
<td>ATF</td>
<td>U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives</td>
</tr>
<tr>
<td>CAPS</td>
<td>Community Action Programme for Safety</td>
</tr>
<tr>
<td>CARICOM</td>
<td>Caribbean Community</td>
</tr>
<tr>
<td>CCTV</td>
<td>Closed-circuit television</td>
</tr>
<tr>
<td>COP</td>
<td>Congress of the People (T&amp;T)</td>
</tr>
<tr>
<td>COP</td>
<td>Commissioner of Police (St. Lucia)</td>
</tr>
<tr>
<td>CSME</td>
<td>CARICOM Single Market and Economy</td>
</tr>
<tr>
<td>CSO</td>
<td>Civil society organization</td>
</tr>
<tr>
<td>DCAF</td>
<td>Geneva Centre for the Democratic Control of Armed Forces</td>
</tr>
<tr>
<td>DDR</td>
<td>Disarmament, demobilization, and reintegration</td>
</tr>
<tr>
<td>EPA</td>
<td>Estate Police Association</td>
</tr>
<tr>
<td>FEC</td>
<td>Firearm User’s (Employee’s) Certificate</td>
</tr>
<tr>
<td>FLA</td>
<td>Firearm Licensing Authority</td>
</tr>
<tr>
<td>FLACSO</td>
<td>Latin American Faculty of Social Sciences</td>
</tr>
<tr>
<td>FUL</td>
<td>Firearm User’s Licence</td>
</tr>
<tr>
<td>G4S</td>
<td>Group4Securicor</td>
</tr>
<tr>
<td>GDP</td>
<td>Gross domestic product</td>
</tr>
<tr>
<td>GSI</td>
<td>Global security industry</td>
</tr>
<tr>
<td>HRC</td>
<td>Human Rights Council</td>
</tr>
<tr>
<td>ICoC</td>
<td>International Code of Conduct for Private Security Providers</td>
</tr>
<tr>
<td>ICT</td>
<td>Information and communications technology</td>
</tr>
<tr>
<td>IDRC</td>
<td>International Development Research Centre</td>
</tr>
<tr>
<td>IIR</td>
<td>Institute of International Relations, the University of the West Indies</td>
</tr>
<tr>
<td>IMF</td>
<td>International Monetary Fund</td>
</tr>
<tr>
<td>ISPS</td>
<td>International Ship and Port Facility Security</td>
</tr>
<tr>
<td>JCF</td>
<td>Jamaica Constabulary Force</td>
</tr>
<tr>
<td>JDF</td>
<td>Jamaica Defence Force</td>
</tr>
<tr>
<td>JSIS</td>
<td>Jamaica Society for Industrial Security</td>
</tr>
<tr>
<td>MDG</td>
<td>Millennium Development Goal</td>
</tr>
<tr>
<td>NAR</td>
<td>National Alliance for Reconstruction</td>
</tr>
<tr>
<td>NCC</td>
<td>National Contracts Commission</td>
</tr>
<tr>
<td>NCC</td>
<td>National Commission on Crime</td>
</tr>
<tr>
<td>NGO</td>
<td>Nongovernmental organization</td>
</tr>
<tr>
<td>NIC</td>
<td>National Insurance Corporation</td>
</tr>
<tr>
<td>NTA</td>
<td>National Training Agency (Jamaica)</td>
</tr>
<tr>
<td>OAS</td>
<td>Organization of American States</td>
</tr>
<tr>
<td>OECD</td>
<td>Organisation for Economic Co-operation and Development</td>
</tr>
<tr>
<td>OECS</td>
<td>Organisation of Eastern Caribbean States</td>
</tr>
<tr>
<td>OLEP</td>
<td>Office of Law Enforcement Policy</td>
</tr>
<tr>
<td>PMC</td>
<td>Private military company</td>
</tr>
<tr>
<td>PMF</td>
<td>Private military firm</td>
</tr>
<tr>
<td>PMSC</td>
<td>Private military and security company</td>
</tr>
<tr>
<td>PNM</td>
<td>People’s National Movement</td>
</tr>
<tr>
<td>PP</td>
<td>People’s Partnership</td>
</tr>
<tr>
<td>PSA</td>
<td>Private Security Authority</td>
</tr>
</tbody>
</table>
Private security company
Private Security Network Commission
Private Security Regulation Authority
Royal St. Lucia Police Force
Security Administrators Limited
Small arms and light weapons
South Eastern and Eastern Europe Clearinghouse for the Control of Small Arms and Light Weapons
Security Managers Association of Trinidad and Tobago
Security Owners and Managers Associates of Trinidad and Tobago
St. Lucia Security Industry Association
Security sector reform
Safe to Work
Trinidad and Tobago
Tobago Organisation of the People
Trinidad and Tobago Defence Force
Trinidad and Tobago Police Service
United National Congress
United Nations Development Programme
United Nations Regional Centre for Peace, Disarmament and Development in Latin America and the Caribbean
Unemployment Relief Programme
University of Trinidad and Tobago
University of the West Indies
Introduction
John Siebert

The origin of the research

The origin of this field research project on private security companies (PSCs) in the Caribbean came from a discussion at a workshop jointly hosted by the Institute of International Relations at The University of the West Indies (IIR UWI) and Project Ploughshares (PP) on 20-21 January 2010 at the St. Augustine campus in Trinidad and Tobago.

The workshop brought together officials from 14 Caribbean Community (CARICOM) member and associate states to advance a regional response to the mounting threats and damage caused by illicit firearms in the Caribbean. Many of the workshop participants were senior police officers from the subregion. They were joined by representatives of Caribbean civil society organizations and regional organizations that included the Organization of American States (OAS) and the United Nations Regional Centre for Peace, Disarmament and Development in Latin America and the Caribbean (UNLIREC), as well as the U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF).

Discussion at this workshop pointed to the effects of illicit gun trafficking and use—as well as some possible solutions—that could be brought into sharper focus by examining the prominent role of PSCs in the Caribbean. PSCs provide security for industries, resorts, and even governments. As such, PSCs often are a first line of observation and response to criminal activities, but can also be a means by which guns move from licit to illicit markets or use.

Aims and objectives of the research

This project contributes to the still limited published information on PSCs in the Caribbean by creating case studies on the private security industry in St. Lucia, Trinidad and Tobago, and Jamaica. The research was designed to describe and analyze PSCs in each country, as well as current national laws and regulations related to the industry. The case study data provide a clearer picture of the roles and functions of PSCs, which can be used by government regulators and the industry itself to raise standards of performance, encourage appropriate policy development, and generally improve the security situation for citizens. The case studies also provide a better understanding of how PSCs fit into the CARICOM security architecture.

The challenge posed by PSCs in the Caribbean

The worldwide and growing trend in providing security services through private companies is clearly evident in the Caribbean.

The growth of the private security industry in the Caribbean over the past two decades appears to have been in response to increasing armed violence and public perceptions of rising violent crime rates. That there is a causal link between these factors was one of a number of assumptions that was challenged in the course of the field research undertaken for the project on PSCs in the three Caribbean countries and the policy roundtable that took place in June 2013 to discuss the findings of the draft case studies.

While the number of PSCs operating in the Caribbean clearly has grown, the regulatory regime for PSCs—consisting of legislation, regulations, and state-directed bodies to implement policy and oversee PSCs—has not evolved to keep pace. Add to this that in English-speaking Caribbean countries the number of employees in PSCs exceeds the number of police and that police capabilities are low and often not trusted. PSC employees can be armed with small arms or light weapons in the course of their duties, making PSCs a major but inadequately regulated factor in the security architecture of the subregion. As a result, PSCs represent a potential challenge to the state security apparatus in these countries and the state’s monopoly on the legitimate use of force in properly functioning democracies.
The privatization of security services also represents a potential challenge to social equity in Caribbean societies. Physical security is a right that should extend to all citizens. If those who can pay for private security services receive greater protection for their persons and property, then zones of insecurity may be disproportionately expanded to populations and locations that find private security too costly to purchase.

The three case studies that make up the bulk of this research report take an inquiring approach to the private security industry in St. Lucia, Trinidad and Tobago, and Jamaica. Complex and fundamental issues were raised in this examination of the role of PSCs in providing security to all Caribbean citizens. Recommendations at the end of each case study and at the conclusion of the research report are intended to provide practical direction to individual states and to the subregion as a whole on how to strengthen the contribution of PSCs to human security for all.

Caribbean PSC Research in Context

The study of PSCs is a relatively new and growing area of research by scholars and practitioners. “Review of Literature on Private Security Companies in the Caribbean” provides an overview of the current state of this research and indicates gaps that exist in research on PSCs in the Caribbean.

To summarize: Empirical research on PSCs in the Caribbean is limited. The OAS did a brief survey of regulations in 10 Caribbean states (Hill 2010). The 2011 UNLIREC study on the control and regulation of PSCs mentions select Caribbean countries. A single-country study has been undertaken as an unpublished Master’s thesis on the industry in St. Lucia (Joseph 2007). A recent report (Burt 2012) relates the regulation of the private security industry in Haiti to the broader question of security sector reform. To date, there is no published subregional or multiple-country primary study on PSCs in the Caribbean. This research study begins to address the gap.

Accurate statistics on the number of PSCs in the Caribbean are not readily available. Except in Jamaica, PSCs are often registered simply as commercial enterprises. Little published detail exists about PSCs and how they relate to the broader security sector. Caribbean PSCs and their possession, storage, and use of small arms and light weapons have not been studied in any depth. The three case studies published here provide important new data that is needed to gain a more nuanced understanding of the challenges faced by Caribbean states in regulating PSCs.

The current lack of industry, national, and international regulatory frameworks argues for greater regulation. However, direction on how best to formulate national and perhaps subregional regulatory regimes is also needed. IIR UWI and PP share the goal of providing relevant and constructive advice on PSC regulatory regimes that is appropriate to the various capacities and unique circumstances of different Caribbean societies.

To meet this challenge the research process included an inception workshop in November 2010 at UWI’s Institute of International Relations. Caribbean academics, policymakers, and public and private security practitioners met to review the goals and methodology of the research. The draft case studies and other elements of the report, including recommendations, were later tested in a policy workshop in Trinidad on 17-18 June 2013, with participation by representatives from governments and the private security industry from the three case-study countries.

Civil society organizations also have a key role in shaping oversight bodies and implementing security frameworks in CARICOM countries. Caribbean civil society representatives participated in the research. We trust that they will be able to use the final report to encourage national governments and the entire subregion to implement recommendations that create incentives for PSCs to contribute more effectively to human security.
Research methodology

This research is a joint project of UWI’s Institute of International Relations and Project Ploughshares. The case study method (Yin 2009) is the primary research method used, supplemented with results from a survey questionnaire (Appendix 2) distributed to PSCs.

The academic literature, newspaper articles, technical reports, and government documents, as well as legislation and regulations were examined to determine the unique characteristics of the PSC industry in the subregion. This secondary research material also provided background colour on problems that have led to the expansion of private security and indicated the main government responses to this growth.

A series of focus groups with key personnel and one-on-one elite interviews with actors involved in the private security industry were conducted. Interviewees included political actors with a vested interest in the industry, such as officials of the Ministries of National Security, Police Services, Defence Forces, and PSC regulatory bodies (where these exist), as well as academics, journalists, and other experts in the Caribbean.

The theoretical framework for the research is primarily drawn from two sources. First is the work of Abrahamsen and Williams (2005a/b/c, 2007a/b, 2008, 2009, 2011), who provide a framework to understand the industry’s growth, as well as shifts in how security is conceived and how PSCs derive authority and legitimacy. They examine three main forces—the global dominance of neoliberal economics, the commodification of security, and the emergence of hybrid public-private security networks—to situate the private security industry in a globalized world in which the very nature of the state and structures of governance and authority are undergoing dramatic change.

Second is Adam White’s (2010) work that relates the analysis of institutional and structural factors to the behaviour of various agents or actors. He traces how and why the private security industry has changed over time and seeks to understand the behaviour of the state, PSCs, and other actors within that changing context.

A brief description of the violence characterizing the Caribbean subregion in the concluding chapter relies on the Global Burden of Armed Violence (Geneva Declaration 2011).

Definition of PSCs

Private security companies provide services traditionally associated with the state security sector—police, intelligence, and military. In the literature a distinction is sometimes made between private military companies (PMCs)—those companies that provide services traditionally associated with national militaries, including fighting forces and mercenaries—and private security companies (PSCs), whose services more closely resemble domestic policing functions. Private security in this sense includes a wide range of services, such as guarding or patrolling, cash transfers, investigative services, alarm installation and monitoring, and security consulting.

Since the English-speaking Caribbean currently does not host wars or armed conflicts, all of the companies encountered in the course of the research are engaged in activities associated with policing. The companies approached to participate in the research in the three case-study countries self-identified as private security providers, either through registration with governments or through public advertising.

For the purposes of this study, then, a PSC will be defined as:

_A private, for-profit company whose main business is the protection of people and assets on behalf of another._

This definition begs a distinction between contract PSCs and proprietary security services. Proprietary security services are internally sourced and resourced; an organization, such as a university campus or a mine, hires its own employees to provide security for its lands or assets.
Global industry trends relevant to the Caribbean

PSCs but not PMCs

PSCs are pervasive throughout the world, but PMCs tend to operate only in active war zones. PMCs have been extensively studied and alarms duly sounded about their recent activities in Iraq, Afghanistan, and parts of Africa. The post-Cold War trend by the U.S. military to engage PMCs for a wide variety of logistical activities such as food services and stationary guarding of military installations clouds this picture somewhat, but does not appear to have a ready application or lesson for security services in the Caribbean.

PSC growth trends

The global private security industry is big business, with an estimated value of US$100-billion to $165-billion per year and an annual growth rate of 7 to 8 per cent (Small Arms Survey 2011). PSCs account for much of this growth, largely in the developing world. Group4Securicor (G4S), the world’s largest PSC, is estimated to employ over half a million people, with annual revenues of $9-billion, and operates in more than 110 countries.

While the ratios vary from place to place, in both developed and developing countries private security personnel often outnumber police officers. The ratios tend to be higher, however, in developing countries where private security employees outnumber public police by as many as 10 to 1 (Abrahamsen and Williams 2007, p. 239).

The growth of PSCs in the Caribbean corresponds with global trends. Registered PSC personnel outnumber police officers in Jamaica, Barbados, Guyana, and Trinidad and Tobago (Hill 2010). PSCs undertake frontline law-and-order functions such as securing ports and airports in the subregion.

Reasons for PSC growth

Many reasons have been cited for the international growth of the private security industry: pro-privatization economic policies; downsizing of national armies in the wake of the Cold War, creating a large pool of unemployed security and military personnel; privatization of the armaments industry; changing structures of global governance; rising crime rates; outsourcing by governments, the United Nations, and nongovernmental organizations of traditionally public sector security functions; and increased demand for protection by businesses and individuals.

This study uses secondary sources rather than new research to explore why PSCs have rapidly expanded in the Caribbean since 1990. These sources point to the corresponding rise in violent crime and the need to protect tourism sites and foreign tourists, as well as growth in other key economic sectors such as the petroleum and extractive industries. Demographic studies of youth bulges, particularly males between the ages of 15 and 30, may point to related increased rates of violent crime. As well, the pattern of illicit drug distribution or trafficking routes often correlates closely to upswings in violent crime rates.

Government decisions to increase reliance on private security services rather than to increase investments in police, intelligence, and military capabilities also seem to be a factor in the growth of PSCs in the Caribbean. There is evidence of declining violent crime rates in some Caribbean countries in recent years, but this has not necessarily led to a contraction in the private security market. Economic slowdowns, such as the worldwide recession in 2008, could point to why there is decreased demand for private security services.

This research report does not attempt to sort out the relevance of any or all of these factors to the growth of PSCs in the Caribbean, opting instead to focus on functional means to address the PSC regulatory deficits in the subregion.
Positive and negative contributions by PSCs

Research in Africa, Eastern Europe, Latin America, and parts of Asia indicates that PSCs can improve security and strengthen socioeconomic development. PSCs often provide additional (private) resources in the (public) fight against crime; can offer potentially superior equipment and more efficient response to crime; enjoy greater flexibility in responding and innovating than do government forces; are an important source of employment, particularly for women; and encourage direct foreign investment by offering more secure worksites.

Country case studies also point to potentially negative results from the growth of PSCs. Access to private security can deepen socioeconomic cleavages and inequality. Rather than a public good available to all, security becomes a commodity available only to those who can pay. The presence of private security can drive crime to poorer neighbourhoods, leading to an increased demand for and presence of guns in unstable situations. The use of private security can distort security needs and offer only short-term fixes for long-term problems. As well, potential links between PSCs and crime networks threaten public security.

Unexplored here but fodder for future research is the relationship between public perceptions of rising violent crime rates and resulting perceptions of insecurity, as well as the impact of the presence of PSC personnel on those perceptions.

PSC regulatory deficits

International laws and frameworks appear insufficient to oversee PSCs and their personnel. Conventions on the use of mercenaries exist, but equivalent conventions on PSCs are not yet in place. Although there is no global system to monitor the activities of PSCs, international instruments are being developed. The non-legally binding 2008 Montreux Document provides guidelines for states on contracting PSCs. A 2010 voluntary International Code of Conduct for Private Security Service Providers had 659 signatory companies in June 2013. As well, a UN working group has proposed legally binding international legislation to control activities of PSCs.

Although PSC actors are subject to the criminal codes and other sanctions affecting citizens of their jurisdictions, the consensus seems to be that, because of the nature of the private security industry and the type of commodity it offers, this industry needs a distinctive regulatory mechanism. Some combination of legislation and industry-maintained guidelines potentially offer the most effective regime.

PSCs and small arms and light weapons

The impetus for this research study arose from a Caribbean discussion of the illicit use of small arms and light weapons in the region. Anecdotal evidence indicates cause for real concern about PSC possession and use of weapons. Security officers often appear publicly in uniform and can easily be confused with official state security representatives such as police. The potential exists for PSC weapons and ammunition to leak into the illicit market or be used or rented out for illegal purposes. Thus strict storage and control mechanisms are needed and special consideration should be given to training and developing guidelines for the use of weapons by PSC employees.

Market segmentation

Particularly evident in the Caribbean private security industry is the segmentation of the security market into smaller, more informal firms, providing basic entry-level services such as guarding or watchman services, and larger more sophisticated PSCs that provide higher-end services such as money transfers and guarding ports and airports. The latter services require adherence to stringent international standards of training and service.
**Increasing technological sophistication**

A shift is taking place in the provision of some private security services from personnel stationed onsite to surveillance using technology that is increasingly cheap and accessible, such as closed circuit television (CCTV) and smartphone applications. This is having an impact on employment levels, as well as requiring that PSC employees upgrade their technical skills.

**The case studies and recommendations**

The private security industries in St. Lucia, Trinidad and Tobago, and Jamaica—the subjects of the three case studies that follow—are representative of the English-speaking membership of CARICOM. The case studies provide new data on the PSC industry in the Caribbean, which serve as the basis for evaluation and policy recommendations. These are provided at the end of each case study as they apply to the particular country under consideration, and in the concluding chapter as they apply to the Caribbean subregion as a whole. All are gathered together in Appendix 1.

The recommendations indicate where industry performance can be improved, thereby enhancing the contribution of PSCs to the human security and socioeconomic development of the Caribbean subregion.
References


Private Security Companies in St. Lucia
Annita Montoute and Sheridon Hill

Introduction

Objectives

This study is situated within the broader context of crime and security and, in particular, gun crime in St. Lucia and the Caribbean generally. The assumption is that effective regulation of private security companies (PSCs) reduces the probability that firearms from PSCs will be diverted to illicit activity. Civil society has been engaged in efforts to promote peace and security at the national, regional, and global levels. A role for civil society in advocating for the regulation and monitoring of private security is therefore an important consideration in this research.

Definition of private security companies

This study uses the following definition of private security companies: nongovernmental, private, for-profit companies whose main business is the protection of people and assets either on its own behalf or on behalf of another.\(^1\) While in the case of the Caribbean we expect to find that most companies offer security, not military services, this definition would not limit the study from considering military services if they exist, or companies operating in the Caribbean that may provide military services elsewhere.

This definition includes both commercial private security companies that provide services to several clients and proprietary or in-house security companies that are employed by the same company or organization they protect, i.e., they provide security services for a single client and only for that client. By comparison, the Private Security Act of St. Lucia No. 28 of 2006 defines a private security business as one providing “security services to any person for remuneration, reward, fee or benefit.”

Methodology and limitations

This study is based on the results of fieldwork undertaken in St. Lucia in April 2011 and follow-up work until August 2011. The report includes data collated from Interviews, questionnaires, statistics, primary documents, and media reports. Information was retrieved and Interviews conducted with officials from government agencies, including the Ministry of Commerce, Industry and Consumer Affairs, the Ministry of Labour, the Ministry of Home Affairs and National Security, the Royal St. Lucia Police Force, the Registry of Companies and Intellectual Property, private security companies, a civil society organization, private security officers, and the umbrella private security organization. Questionnaires were completed by one in-house security operation and five private security companies.

The researchers faced challenges that placed limitations on the research process and output. First, with the exception of one Master’s thesis by Callixtus Joseph, very little empirical research has been conducted on the subject; this prolonged the research process. Second, stakeholders were reluctant to provide certain types of information related to revenue, employees, and firearms. This affected the quality of some aspects of the empirical data. Third, because of the relative lack of regulation of the private security sector in St. Lucia, state agencies had very little information on the research subject. The researchers, therefore, had to rely primarily on the private security sector for data.

National context and development

Demographics

In 2010 the population of St. Lucia was estimated at 165,595, with 82,194 males and 83,401 females (St. Lucia 2010a). The two most populated districts are the capital Castries and Gros Islet, accounting for 39.6 per cent and 15.2 per cent of the population respectively.
**Political context**

St. Lucia’s system of parliamentary democracy is patterned after the Westminster model. The Head of State is represented by the Governor-General who has ceremonial functions. Actual power lies in the Prime Minister and the Cabinet. St. Lucia has an independent judiciary comprising district courts and a high court. Appeals may be made to the Eastern Caribbean Court of Appeal and to the Judicial Committee of the Privy Council in London. St. Lucia has a coast guard and a paramilitary Special Services Unit in the police force, but does not have an army (WHA 2012).

Historically, St. Lucia’s major foreign policy objective has been fostering economic development through economic cooperation and promoting trade and investment. St. Lucia pursues its foreign policy largely through the Organisation of Eastern Caribbean States (OECS) and CARICOM. St. Lucia is also a member of the Commonwealth, the Organization of American States (OAS) and the United Nations.

**Socioeconomic context**

Tourism and agriculture are the main revenue earners. St. Lucia does not have a significant manufacturing sector, mainly due to its small market size and lack of competitiveness relative to other CARICOM States, particularly Trinidad and Tobago (CANARI 2010). Bananas used to be the main revenue earner until the 1990s when the industry began to decline, due to competition from Latin American banana producers and the erosion of European Union trade preferences for the African Caribbean, Pacific group of states (CANARI 2010; Fairtrade Foundation 2012). Along with the decline of this industry, natural disasters and other factors have seriously damaged the economy. At the end of December 2010 St. Lucia’s total outstanding public debt was 2,036.6-million Eastern Caribbean dollars, representing 64.8 per cent of GDP; of this amount, $1,063.4-million was external debt (St. Lucia 2010b).

Poverty is a serious problem in St. Lucia. The most recent poverty assessment study (2005) provides a picture of socioeconomic conditions. The study indicates that 28.8 per cent of residents are at or below the poverty line, with 1.6 per cent indigent. The young are a disproportionate number of those living below the poverty line. In 2005 children aged 0-14 represented 39 per cent of all poor persons, while 7 per cent of the poor population were 65 years and older. The elderly are very poor and those most reliant on public assistance are among the poorest. Several participants in the poverty assessment survey held the view that poverty contributed to several problems in the family (St. Lucia 2005/6).

Most indigent females reside in Micoud (27.5 per cent), Vieux Fort (21.8 per cent), and suburban Castries (15.3 per cent). There were also high levels of indigence among men in Vieux Fort. The 2005 study showed that poor unemployed men and women, particularly single parents, were unable to provide a caring and nurturing environment or meet the basic needs of the family. Poverty also undermines and erodes men’s sense of masculinity and manhood, and causes some women to engage in and use transactional sex for their livelihood (St. Lucia 2005/6).

**Crime and security**

CRIME STATISTICS

There is a general perception that crime is on the increase in St. Lucia. The evidence in Table 1, however, indicates that this might not necessarily be the case. The numbers for “crimes against the person” fluctuated slightly between 1996 and 2004. In 2005 there was a drop that was significantly lower than the 1996–2004 level. The numbers for the next two years were slightly higher, but did not revert to the pre-2005 level. The numbers for firearm offences have been fairly constant, fluctuating only slightly over the period, with no significant change.

For all categories and total firearm offences, the numbers have been fairly constant, with only slight fluctuations over the 2000–2009 period. See Table 2 for an illustration.
Table 1: Reported offences by category, 1996–2007

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Against the person</td>
<td>4848</td>
<td>4671</td>
<td>4708</td>
<td>4685</td>
<td>4875</td>
<td>5229</td>
<td>5020</td>
<td>5119</td>
<td>5089</td>
<td>2371</td>
<td>2548</td>
<td>2796</td>
</tr>
<tr>
<td>Against property</td>
<td>7168</td>
<td>7607</td>
<td>7052</td>
<td>6550</td>
<td>6828</td>
<td>6949</td>
<td>6646</td>
<td>6332</td>
<td>6473</td>
<td>5506</td>
<td>5408</td>
<td>5159</td>
</tr>
<tr>
<td>Firearm offences</td>
<td>118</td>
<td>118</td>
<td>118</td>
<td>95</td>
<td>129</td>
<td>143</td>
<td>160</td>
<td>214</td>
<td>200</td>
<td>199</td>
<td>160</td>
<td>166</td>
</tr>
</tbody>
</table>

Source: St. Lucia Central Statistics Office

Table 2: Reported firearm offences, 2000–2009

<table>
<thead>
<tr>
<th>Firearm offences</th>
<th>2000</th>
<th>2001</th>
<th>2002</th>
<th>2003</th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
<th>2009</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Possession of unlicensed firearm</td>
<td>53</td>
<td>54</td>
<td>56</td>
<td>62</td>
<td>51</td>
<td>57</td>
<td>37</td>
<td>42</td>
<td>52</td>
<td>40</td>
<td>504</td>
</tr>
<tr>
<td>Unlawful possession of firearm</td>
<td>43</td>
<td>56</td>
<td>44</td>
<td>54</td>
<td>39</td>
<td>42</td>
<td>38</td>
<td>38</td>
<td>43</td>
<td>41</td>
<td>438</td>
</tr>
<tr>
<td>Discharging firearm with intent</td>
<td>33</td>
<td>33</td>
<td>60</td>
<td>98</td>
<td>110</td>
<td>73</td>
<td>48</td>
<td>37</td>
<td>27</td>
<td>30</td>
<td>549</td>
</tr>
<tr>
<td>Other</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>27</td>
<td>37</td>
<td>49</td>
<td>54</td>
<td>25</td>
<td>194</td>
</tr>
<tr>
<td>Total firearm Offences</td>
<td>129</td>
<td>143</td>
<td>160</td>
<td>214</td>
<td>200</td>
<td>199</td>
<td>160</td>
<td>166</td>
<td>176</td>
<td>136</td>
<td>1685</td>
</tr>
</tbody>
</table>

Source: RSLPF

What seems to be perpetuating the perception that crime is on the increase is the changing nature of crime. Crimes have been increasingly violent in recent times. Criminals are acting with impunity, shooting in broad daylight, on crowded streets and public places. See Table 3 for the number of homicides for 2008 and 2009.

The data in Table 4 show that violent crimes have increased; for example, there was a 550 per cent increase in the rate of murder and manslaughter from 1995 to 2006. Robbery, a crime against property, also increased sharply over the 11-year period. On the other hand, as we saw in Table 1 other categories of crime under “crime against the person” and “crime against property” are not on the increase. The categorization of crime has not been consistent for the period in question, but we can see a trend in the areas where they are. “Wounding” shows a steady decline (except for 2004), moving from 1,061 in 2000 to 845 in 2006. “Threats” declined from 1,010 in 2000 to 417 in 2006 and “other” (crimes against the person) remained relatively constant: 222 in 2000 and 235 in 2006. Under “crimes against property,” “False pretence/forgery/fraud” was 131 in 2000 and 83 in 2006. There were fluctuation and eventual decrease in the number of reports of praedial larceny and currency offences for the same period (RSLPF n.d.).
Table 3: Number of homicides, 2008 and 2009

<table>
<thead>
<tr>
<th>Month</th>
<th>2008</th>
<th>2009</th>
</tr>
</thead>
<tbody>
<tr>
<td>January</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
<td>February</td>
<td>4</td>
<td>1</td>
</tr>
<tr>
<td>March</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>April</td>
<td>4</td>
<td>1</td>
</tr>
<tr>
<td>May</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>June</td>
<td>4</td>
<td>8</td>
</tr>
<tr>
<td>July</td>
<td>4</td>
<td>2</td>
</tr>
<tr>
<td>August</td>
<td>2</td>
<td>5</td>
</tr>
<tr>
<td>September</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>October</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>November</td>
<td>5</td>
<td>2</td>
</tr>
<tr>
<td>December</td>
<td>3</td>
<td>n/a</td>
</tr>
<tr>
<td>Total</td>
<td>39</td>
<td>35</td>
</tr>
</tbody>
</table>

Source: CAPS 2009

*Figures for 2009 are for January–November. Of the 35 homicides for 2009, 19 were shootings. Thirty of the victims were male, five female.

Table 4: Reported cases of murder/manslaughter and robbery, 1995–2006

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Murder &amp;</td>
<td>8</td>
<td>9</td>
<td>12</td>
<td>14</td>
<td>14</td>
<td>23</td>
<td>34</td>
<td>42</td>
<td>36</td>
<td>39</td>
<td>45</td>
<td>44</td>
</tr>
<tr>
<td>Manslaughter</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Robbery</td>
<td>160</td>
<td>204</td>
<td>254</td>
<td>265</td>
<td>288</td>
<td>290</td>
<td>299</td>
<td>352</td>
<td>324</td>
<td>385</td>
<td>422</td>
<td>377</td>
</tr>
</tbody>
</table>

Source: CAPS 2009

Table 5: Victims of shootings by age, July–November 2009 (2 by police)

<table>
<thead>
<tr>
<th>Age (years)</th>
<th># of victims</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-10</td>
<td>1</td>
</tr>
<tr>
<td>11-20</td>
<td>5</td>
</tr>
<tr>
<td>21-30</td>
<td>10</td>
</tr>
<tr>
<td>31-40</td>
<td>7</td>
</tr>
<tr>
<td>41-50</td>
<td>7</td>
</tr>
<tr>
<td>51-60</td>
<td>2</td>
</tr>
<tr>
<td>61-70</td>
<td>1</td>
</tr>
<tr>
<td>71+</td>
<td>2</td>
</tr>
</tbody>
</table>

Source: CAPS 2009

Table 5 indicates that 35 people were victims of shootings in 2009. While all age groups are affected, the age group 21–30 years is the most vulnerable.
The statement of Prime Minister King in 2010 confirms the view that crime is becoming more violent: “Never before have we seen such senseless violence, such anger and manifested self-hate.”

Table 6 shows the number of households that reported on the 2010 Housing Census that they had been victims of various crimes. The highest numbers are among households in rural Castries. The number of cases reported in the census is dramatically higher than the number reported to the police. In the category of shootings, for example, the self-reported cases of households are 56 per cent higher than total cases reported to the police.3

Table 6: Distribution of households reporting as victims of various crimes, 2009

<table>
<thead>
<tr>
<th>District</th>
<th>Number of Households</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Murder*</td>
</tr>
<tr>
<td>Castries City</td>
<td>7</td>
</tr>
<tr>
<td>Castries Suburban</td>
<td>9</td>
</tr>
<tr>
<td>Castries Rural</td>
<td>45</td>
</tr>
<tr>
<td>Anse La Raye</td>
<td>8</td>
</tr>
<tr>
<td>Canaries</td>
<td>0</td>
</tr>
<tr>
<td>Soufriere</td>
<td>6</td>
</tr>
<tr>
<td>Choiseul</td>
<td>7</td>
</tr>
<tr>
<td>Laborie</td>
<td>5</td>
</tr>
<tr>
<td>View Fort</td>
<td>14</td>
</tr>
<tr>
<td>Micoud</td>
<td>17</td>
</tr>
<tr>
<td>Dennery</td>
<td>20</td>
</tr>
<tr>
<td>Gros Islet</td>
<td>15</td>
</tr>
<tr>
<td>TOTAL</td>
<td>153</td>
</tr>
</tbody>
</table>

*Exaggeration by respondents possible. Source: St. Lucia 2011

THE GOVERNMENT’S NATIONAL CRIME PREVENTION STRATEGY
Among the early government initiatives at fighting crime was the National Commission on Crime (NCC). The Commission was established by an act of Parliament in 2003 as an advisory body to the government. The NCC was established after a UWI study showed that there was public discontent with the criminal justice system, the police, and crime levels in St. Lucia (ICCP 2008).

The Community Action Programme for Safety (CAPS)4 replaced the NCC in 2007 to reflect the government’s shift from a policy-oriented approach to an action-oriented approach in combating crime. This shift was based on research that supports crime fighting strategies that include not only law enforcement and the criminal justice system, but a diversity of actors. CAPS aimed to prevent crime by addressing unemployment and promoting education, families, and youth welfare; and reducing opportunities for crime repeat victimization and fostering positive conflict resolution through education and public awareness programs toward attaining a culture of lawfulness and tolerance (ICCP 2008).

There is also an advisory committee consisting of representatives from the Ministry of Education and Culture, Ministry of Community Development, Royal St. Lucia Police Force, Bordelais Correctional Facility, Magistracy, Family Court, NGOs,5 and faith-based organizations to help with CAPS strategic development and implementation (ICCP 2008).
As violent crime continued unabated, the government responded with other measures. In May 2010 the Government took emergency measures in response to unusually high rates of homicide stemming from escalating gang warfare. An emergency Cabinet meeting in May agreed to do the following:

- Create a Cabinet Task Force on Crime and Security comprising several government ministers and chaired by the Prime Minister and partner with relevant actors in the fight against crime;
- Establish a 24-hour surveillance and patrol strategy targeted at troubled areas or hotspots;
- Reorganize the police force and reintroduce the cadet program;
- Accelerate the disbursement of resources to recommence the HOPE program;
- Request that the National Insurance Corporation make a one-time financial contribution toward the provision of employment opportunities in inner-city communities;
- Open the police substation at Rodney Bay;
- Take steps to enhance, update, and strengthen legislation to support law and order;
- Speed up the appointment of Social Transformation Officers to work in inner-city communities (King 2010).

The next year, as crime continued unabated, the King administration (2011) presented the following points in a plan to combat crime and enhance security:

1. Enhance the capacity and capability of the police, in terms of hardware, training, and numbers; equip and empower them to discharge their duties;
2. Support the police in a campaign to vigorously pursue, directly confront, and disable criminal elements, wherever they may be;
3. Continue to seek and obtain technical and material assistance from friendly governments, and collaborate with regional and subregional governments to address crime and security issues, including the protection of our borders;
4. Strengthen existing legislation and introduce new laws where necessary, in consultation with the judiciary and legal systems, and seek support of relevant institutions to ensure enforcement;
5. Implement a program of social reform and renewal, targeting all areas, particularly inner-city communities and youth;
6. Engage in the widest possible consultative approach with all sectors of society on strategies to confront the crime and security challenges facing us, including convening a joint session of Parliament.

The King government had previously pledged that the police would work jointly with the Inland Revenue Department and Customs and requested the destruction of abandoned buildings, which are often used by criminals (King 2010). In September 2011 the government launched yet another initiative, the United Against Crime Campaign, billed as a “bold new approach to fighting crime in Saint Lucia that involves getting citizens more involved in the crime fighting process. The programme seeks to create direct linkages with the police and the public and educate St. Lucians about how they can protect themselves from being victims of crime. The programme is also community and youth centered with sustainable ways of curbing crime” (UACC Launch 2011).

The 2010 and 2011 strategies also indicated recognition of the multidimensional nature of crime by targeting such concerns as effective policing, legislative reform, and social programs. However, the 2011 plan went beyond the 2010 strategy by seeking international assistance and regional collaboration to combat crime.

It is important to note that the private security industry is not explicitly mentioned in this plan to curb crime in the country. This is very revealing. It does not appear that the Government considers PSCs potential partners that can contribute to the fight against crime. However, there have been instances in the past of collaboration between the public sector and private security. A number of PSCs are also contracted to provide security at the country’s airports and ports (SLASPA, n.d.).
The significance and growth of the private security industry

The private security industry grew slowly after its start in the 1970s, but has grown exponentially since the 1990s. In the 1970s there were three PSCs; in 2009 the number of registered PSCs was estimated at 55. Growth is shown in Figure 1 below.

**Figure 1: Cumulative number of registered private security companies**

![Graph showing cumulative number of registered private security companies from 1970 to 2020.](image)

Source: Registry of Companies and Intellectual Property (St. Lucia)

In the initial years, there was little demand for sophisticated security services. Private citizens, businesses, and government buildings primarily employed watchmen and burglar bars to secure their properties and businesses (Phillips 2010). The increase in violent crime and the fear of crime have contributed to the increase in the number of PSCs and a wider range of security service. There is another compelling reason, however, for the upsurge in private companies in St Lucia: fulfilling insurance requirements (Phillips 2010). It has been reported that insurance premiums are lower for businesses that provide security on their premises. As a result, companies hire security guard services and take other security measures. In some cases security is token, only sufficient to satisfy the insurance company.

Not only has there been an increase in the number of security businesses, but they are growing in sophistication as well. Joseph (2007) provides the following reasons for the shift from the traditional to more modern security services: “the growth of mass private properties such as hotels and commercial businesses; the increased demand for security in the wake of both domestic and international issues such as perceived/real increasing crime rates; the accessibility and affordability of security technological products; the increasing diversity of the private security industry; increased international standards at ports; and security becoming a lucrative market for both local and regional companies.”

By the mid-1980s the watchman era was fading. Canine services were among the new services offered. Clients at that time were not convinced that the dogs would provide significant added security and so canine services dwindled. However, in recent years canine service providers, including a unit within the police force, have rebounded. Complementing the private security officer is new technology, including burglar alarm systems and closed circuit TV, as well as the central monitoring station and steadily advancing electronic security (Joseph 2007).
In addition to the more common contracted services that we have been referring to, two other types of private security arrangements have emerged over time: proprietary (in-house) and hybrid arrangements. The latter suggests a combination of elements from different models. One instance of the use of a hybrid model is the security arrangement at the Bank of St. Lucia. In the past, the National Insurance Corporation used a hybrid model in which their security guards were special constables with the same powers and immunities as the St. Lucia police force while on the premises, although provisions for salaries and benefits were by private agreement. In the case of proprietary or in-house security, in which the business’s security personnel are hired as part of the staff, the former are viewed more as staff of the establishment than as private security. This is common in the hotel industry.\(^6\)

There have also been attempts to professionalize the industry. For example, there have been many initiatives to assist in the improvement, qualification, and certification of persons employed by security companies. In September 2002 the St. Lucia Security Industry Association (SSIA), the official trade association for the suppliers of security products and services, was launched with 10 member companies. Its objectives were to (a) act as the representative organization for private security companies in liaising with the government, the police, insurers, and other relevant organizations; and (b) promote and maintain high standards of practice and professionalism in the private security industry (Phillips 2010). The SSIA, currently with 15 members, has not held regular members meetings for the past year.\(^7\)

Another attempt to improve the industry was the launching of the Private Security Academy by the St. Lucia Private Security Industry Association in October 2004. The Academy aimed to promote improved efficiency standards for security practitioners and those desirous of pursuing private security as a career. The courses were designed to train security officers for banking, commercial, hospitality, industrial, and other sectors. The Academy was accredited by The University of the West Indies (St. Lucia) and approved by the Royal St. Lucia Police Force (Phillips 2010).

Both the SSIA and the Private Security Academy have been stagnant for some time and efforts to revive them have been unsuccessful. The Private Security Academy conducted one training session in 2004. Two groups of guards were trained in basic security and one group received site-specific training and graduated with certificates. No other training sessions have taken place since then (Phillips 2010).

A further attempt at the professional development of the industry was the launching of Chapter No. 246 of the American Society of Industrial Security (ASIS) in August 2005.\(^8\) ASIS provides members and the security community with access to a full range of programs and services, including training in aviation security. Increased threats to aviation security have resulted in a drive to thorough screening of private security officers, training by qualified instructors, and computer-based training to handle passengers travelling through Caribbean ports (Phillips 2010).

The passing of legislation in 2006 to regulate the industry marked an important watershed in the history of the industry. This move, however, did not emerge out of the realization of the need to regulate the industry, but was largely driven by requirements for St. Lucia to qualify as a Cricket World Cup venue. The International Cricket Council required a legal framework under which PSCs operated to be able to hire PSCs to provide security for the event. It was against this backdrop that the Private Security Act No. 28 of 2006 was passed.

The Act was primarily based on the Private Security Acts of South Africa, as well as on legislation from the United Kingdom (Phillips 2010). Although the Act was passed, several factors together have contributed to its lack of implementation to date. The legislation aroused much controversy. Most PSCs were against the contents of the Act as well as the concept of regulation. They were of the view that the Act was too stringent and required significant resources and capital investment to maintain costly standards. The Industry Association, led by one PSC, showed the most interest in the legislation. Subsequent to the passage of the Act, there was a change in government; the new government did not see it as a priority. Therefore, there was little effort to appoint the Private Security Authority to operationalize the Act.\(^9\)
Today there has been a shift in the climate that is more favourable to the implementation of the Act. The government that passed the Act is back in office. Different actors, dominated by large conglomerates and the larger companies such as G4S and Guardsman, now support regulation. A culture of regulation and standards has emerged, exemplified by the greater power to execute standards given to the Bureau of Standards and the standards for mass public events developed by the National Emergency Management.10

The positive collaboration that occurred between PSCs and the police during the Cricket World Cup in 2007 signaled that there are benefits to be derived from the regulation of the private security industry. Moreover, the growth and increasing sophistication of the industry mean that effective regulation can no longer be put on hold.

Industry characteristics and emerging trends

Number of companies

The exact number of private security companies in St. Lucia is very difficult to determine as there is no central registry for PSCs. Private security businesses are registered along with other businesses, with no code to distinguish them. It is also common for persons not to register their operations with the Registry of Companies.11 We can, therefore, provide only estimates.

In 2011 approximately 56 private security companies provided guard and patrol services, security equipment, and systems services. This number is lower than the figure cited in the Joseph study more than five years ago, but is only an estimate and might not be exact. It is possible that smaller companies have closed down since the Joseph study, leaving the field to larger firms. Approximately 18 registered companies offer guard and patrol services. We found 13 listed in the telephone directory (see Table 7). We found at least six unregistered companies in operation, one listed in the telephone directory.
Table 7: Security companies by category

<table>
<thead>
<tr>
<th>Security control and systems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Digitel Systems and Services Ltd</td>
</tr>
<tr>
<td>Joseph Systems and Services Ltd</td>
</tr>
<tr>
<td>Protector Security Systems</td>
</tr>
<tr>
<td>AES System</td>
</tr>
<tr>
<td>Caribbean Awnings Production Company Ltd</td>
</tr>
<tr>
<td>Energy and Advance Control Technologies</td>
</tr>
<tr>
<td>Glass Experts INC</td>
</tr>
<tr>
<td>Inkspot</td>
</tr>
<tr>
<td>Protection Plus INC</td>
</tr>
<tr>
<td>Regional Fire and Security (St. Lucia) Ltd</td>
</tr>
<tr>
<td>Storm Security</td>
</tr>
<tr>
<td>Video Surveillance Ltd</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Security guards and patrol</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alternative Security Services</td>
</tr>
<tr>
<td>General Security Services</td>
</tr>
<tr>
<td>Guardsman (St. Lucia Ltd)</td>
</tr>
<tr>
<td>G4S Services (St. Lucia Ltd)</td>
</tr>
<tr>
<td>E&amp;R Security Services</td>
</tr>
<tr>
<td>Global Guardians INC</td>
</tr>
<tr>
<td>Global Guardians and Investigations</td>
</tr>
<tr>
<td>Island Wide Security Services</td>
</tr>
<tr>
<td>MIB (Security Services) Ltd</td>
</tr>
<tr>
<td>Proficient Security Services</td>
</tr>
<tr>
<td>Secure St Lucia (1986) Ltd</td>
</tr>
<tr>
<td>Sentinel Security Services Ltd</td>
</tr>
<tr>
<td>St Lucia Private Investigations and Security Services</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Security control and systems and security guards and patrol</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sentinel Security Services Ltd</td>
</tr>
<tr>
<td>Global Guardians INC</td>
</tr>
<tr>
<td>Island Wide Security Services</td>
</tr>
<tr>
<td>Secure St Lucia (1986) Ltd</td>
</tr>
</tbody>
</table>

Source: St. Lucia Telephone Directory

**Sectors served and range of services offered**

Private security companies are providing services to a wide range of sectors, including manufacturing (factories and warehouses), tourism and hospitality (restaurants, hotels, and guesthouses), transport and telecommunications (airports and seaports), energy (electricity gas plants, utility office branches), financial (banks, credit unions), real estate (rented houses and business services), public services (government offices), and extraterritorial bodies (NIC 2013). Table 8 shows the sectors served by four companies, including two of the top three companies in St. Lucia. Three of the four companies provide services to financial institutions, the tourism and hospitality sector, government entities, and private citizens.
Table 8: Sectors served by select private security companies

<table>
<thead>
<tr>
<th>Client group/industry</th>
<th>Guardsman</th>
<th>G4S</th>
<th>Sentinel Security</th>
<th>Superior Security</th>
</tr>
</thead>
<tbody>
<tr>
<td>Extractive industry</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Financial institutions</td>
<td>√</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Government entities</td>
<td>√</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hospitality &amp; tourism industry</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(hotels, restaurants)</td>
<td>√</td>
<td>√</td>
<td></td>
<td></td>
</tr>
<tr>
<td>International entities, embassies</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Manufacturing Industry</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nongovernmental organizations</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Private citizens</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Retail outlets</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transportation facilities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(airports, seaports, marinas)</td>
<td></td>
<td></td>
<td></td>
<td>√</td>
</tr>
</tbody>
</table>

Source: Based on survey results

Ownership of the industry

The private security industry is largely nationally owned. G4S is the only international company operating in St. Lucia. The Trinidad-owned Alternative and Jamaican-owned Guardsman are the only two companies owned by other Caribbean nationals. Based on number of employees, Guardsman is the market leader, followed by Secure St. Lucia (nationally owned) and G4S. See Table 10 for the ownership of a select group of 14 companies that provide guard and patrol services.

There do not seem to be significant differences between foreign-owned and nationally owned private companies in the services offered and sectors served. However, it is noteworthy that among the companies highlighted in Table 9, Guardsman and G4S offer a wider range of services than do local companies. It is also significant that two of the top three companies are foreign-owned. Guardsman asserts that their company stands out in the areas of training and certification for firearm usage. The assessment of the suitability of candidates to carry firearms is very rigorous. Retraining of successful candidates is ongoing. G4S reports that what distinguishes them from other companies is a “more stringent management and accounting structure and adherence to an internationally recognized business ethics policy.” It was further reported that employees have been transferred to Canada and U.K. G4S operations.
Table 9: Services offered by select private security companies

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Armed guarding</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unarmed guarding</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Armed escort</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unarmed escort</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cash-in-transit/ money escort</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Merchandise-in-transit</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Guard dogs</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Armoured cars</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vehicle patrol</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Alarm installation and monitoring</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>IT security and network protection</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Electronic security surveillance</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Prisoner transfer</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Repossession of collection service</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Private investigation/ detectives</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Risk management consulting</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Security consulting</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Training services</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Airport security</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Radio patrols</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Party traffic controls</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Armed rapid response</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Sources: Advertisements of private security companies; questionnaire results

**Employment**

From a total St. Lucia workforce of 67,703 (St. Lucia 2010a), 868 are employed by 16 private security companies (see Table 11). Fifty-five per cent work for one of the top three PSCs; 45 per cent work for one of the three non-national companies. While the top company pays the highest salaries, several smaller companies pay higher salaries than larger ones.
Table 10: Ownership of private security companies

<table>
<thead>
<tr>
<th>Number</th>
<th>Private Security Company</th>
<th>Global</th>
<th>Regional</th>
<th>National</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Alternative Security Services</td>
<td></td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>General Security Services</td>
<td></td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>3</td>
<td>Guardsman (St. Lucia Ltd)</td>
<td></td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>4</td>
<td>G4S Services (St. Lucia Ltd)</td>
<td></td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>5</td>
<td>E&amp;R Security Services</td>
<td></td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Global Guardians INC</td>
<td></td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Global Guardians and Investigations</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Island Wide Security Services</td>
<td></td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>9</td>
<td>Mars Canine Security</td>
<td></td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>10</td>
<td>MIB (Security Services) Ltd</td>
<td></td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>11</td>
<td>Ronin Security Services</td>
<td></td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>12</td>
<td>Rottweiler Services</td>
<td></td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>13</td>
<td>Sentinel Security Services Ltd</td>
<td></td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>14</td>
<td>St. Lucia Private Investigations and Security Services</td>
<td></td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>15</td>
<td>Mars K-9 Services</td>
<td></td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>16</td>
<td>Strike Force</td>
<td></td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>17</td>
<td>Superior Security Services</td>
<td></td>
<td></td>
<td>√</td>
</tr>
</tbody>
</table>

Table 11:
Employment figures, average salary for select private security companies, 2011

<table>
<thead>
<tr>
<th>Number</th>
<th># of employees</th>
<th>Average monthly salary (in EC$)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>195</td>
<td>1,703.60</td>
</tr>
<tr>
<td>2</td>
<td>149</td>
<td>1,166.90</td>
</tr>
<tr>
<td>3</td>
<td>137</td>
<td>1,545.00</td>
</tr>
<tr>
<td>4</td>
<td>105</td>
<td>832.70</td>
</tr>
<tr>
<td>5</td>
<td>52</td>
<td>819.82</td>
</tr>
<tr>
<td>6</td>
<td>49</td>
<td>1,521.09</td>
</tr>
<tr>
<td>7</td>
<td>47</td>
<td>1,539.60</td>
</tr>
<tr>
<td>8</td>
<td>24</td>
<td>1,528.83</td>
</tr>
<tr>
<td>9</td>
<td>22</td>
<td>1,075.18</td>
</tr>
<tr>
<td>10</td>
<td>20</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>19</td>
<td>961.94</td>
</tr>
<tr>
<td>12</td>
<td>18</td>
<td>1,350.28</td>
</tr>
<tr>
<td>13</td>
<td>11</td>
<td>1,188.14</td>
</tr>
<tr>
<td>14</td>
<td>8</td>
<td>917.50</td>
</tr>
<tr>
<td>15</td>
<td>7</td>
<td>1,100.43</td>
</tr>
<tr>
<td>16</td>
<td>5</td>
<td>1,211.80</td>
</tr>
</tbody>
</table>

Source: National Insurance Corporation (St. Lucia)
Annual revenue

It is difficult to determine the actual revenue generated by private security companies for two main reasons: owners and managers are reluctant to reveal the financial status of their company and the total number of companies is unknown. However, the annual revenue of a leading company provides some indication of the significant revenue generated by the industry. Over a five-year period, this company made EC $24-million, with income growing steadily during this time (see Table 12). Another significant player reported revenue for 2001 of EC $1.8-million and EC $1.5-million for 2010. The decline in revenue resulted from the sale of the guard and cash-in-transit services to another company. The company was left with only electronic security services, which experienced low sales.

Table 12: Total annual revenue for a major private security company, 2006–2010

<table>
<thead>
<tr>
<th>Year</th>
<th>Annual revenue (in EC$)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006</td>
<td>2,000,000</td>
</tr>
<tr>
<td>2007</td>
<td>3,000,000</td>
</tr>
<tr>
<td>2008</td>
<td>5,000,000</td>
</tr>
<tr>
<td>2009</td>
<td>7,000,000</td>
</tr>
<tr>
<td>2010</td>
<td>7,000,000</td>
</tr>
<tr>
<td>TOTAL</td>
<td>24,000,000</td>
</tr>
</tbody>
</table>

Source: Data derived from questionnaire results with private security respondents

Gender considerations

It is estimated that the ratio of male to female employees in the private security sector is 80:20.\textsuperscript{16} This compares to an estimated ratio of 70:30 for state security. The data in Table 13 confirm the view that the industry is male dominated. One firm reported that, while they employ many females, only a few are authorized to carry firearms. It seems that women have had little success in passing in-house examinations to carry firearms.\textsuperscript{17} Additionally, among a sample of 12 private security companies, only one is headed by a woman and only one owned by a woman.\textsuperscript{18}

The manager of a private security firm observed that cases of sexual harassment by male colleagues are known, but very few cases are reported. She notes, however, that this phenomenon is not peculiar to the private security industry. Female private security interviewees did not report cases of harassment from their peers, but one reported that she and other female colleagues have experienced harassment from employees of hotels where many female guards are posted.

An interesting issue that emerged was the development of relationships between female and male private security officers. One interviewee said that she was paired with a male colleague for night duty for a period of time; they developed a relationship that initially caused the breakup of the relationship she had been in, although she was subsequently able to salvage it.

Female interviewees described the challenges they faced as single parents working 12-hour night shifts. One said that she had neglected her parental responsibilities to her nine-year-old son, who was practically being raised by her mother, and eventually left that job. Another interviewee said that since she had started working a year-and-a-half earlier for a firm that required her to work nights, she had been forced to allow her child’s father to assume responsibility for him. It must be noted, however, that the overwhelming majority of security firms do not employ females to work the night shift. Most women in this sector work from 8 a.m. to 4 p.m. and do not express concerns that differ significantly from those encountered in other sectors.
Table 13: Gender breakdown of employees of select PSCs

<table>
<thead>
<tr>
<th>Private security company</th>
<th>Male</th>
<th>Female</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alternative Security Services</td>
<td>26</td>
<td>21</td>
<td>47</td>
</tr>
<tr>
<td>E&amp;R Security Services</td>
<td>15</td>
<td>3</td>
<td>18</td>
</tr>
<tr>
<td>MiB (Security Services) Ltd</td>
<td>12</td>
<td>7</td>
<td>19</td>
</tr>
<tr>
<td>Ronin Security Services</td>
<td>24</td>
<td>0</td>
<td>24</td>
</tr>
<tr>
<td>Rottweiler Services</td>
<td>7</td>
<td>0</td>
<td>7</td>
</tr>
<tr>
<td>Mars Canine Services</td>
<td>4</td>
<td>1</td>
<td>5</td>
</tr>
<tr>
<td>York Select Security Services</td>
<td>21</td>
<td>1</td>
<td>22</td>
</tr>
<tr>
<td>St. Lucia Private Investigations and Security Services</td>
<td>7</td>
<td>4</td>
<td>11</td>
</tr>
<tr>
<td>Superior Security Services</td>
<td>7</td>
<td>1</td>
<td>8</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>123</strong></td>
<td>38</td>
<td><strong>161</strong></td>
</tr>
<tr>
<td><strong>Percentage</strong></td>
<td><strong>76.4</strong></td>
<td><strong>23.6</strong></td>
<td><strong>100</strong></td>
</tr>
</tbody>
</table>

Source: Result of questionnaires

*Interindustry and agency collaboration and linkages*

Currently there is no institutionalized link between the private security sector and relevant Government departments. Neither the Ministry of Commerce, Industry, Trade and Consumer Affairs nor the Ministry of Home Affairs and National Security collects data on the industry. However, the Commerce Ministry does process trade licence applications for the establishment of foreign private security companies, as well as other foreign firms.

The relationship between the state police and private security has been conducted on formal, informal, and ad hoc bases. During the Cricket World Cup in 2007 a National Security Committee was established, creating a partnership between the national law enforcement agencies and private security companies. This Committee ended with the conclusion of the tournament. An established link exists between the private security industry and the Royal St. Lucia Police Force, which facilitates the licensing of firearms for PSCs. It is also common practice for off-duty police officers to provide services to private security companies. More common is for businesses to employ police officers to provide security services, especially for cash transfers. Such practices have led to allegations of misconduct, with police officers reporting in sick to their regular job to perform private security work using state firearms. Off-duty employment has become so common that the Standing Order of the Royal Saint Lucia Police Force concerning Police Related Off-Duty Employment for Members of the Force was passed in January 2010 to regulate off-duty employment of Police Officers. The policy states:

It is the policy of the Royal Saint Lucia Police Force to regulate Police related off-duty employment to ensure an employee’s fitness for duty to prevent conflicts of interest which might arise because of the nature of an Officer’s off-duty employment. Police related off-duty employment is a privilege, not a right, and is secondary to regular duties assigned. The Commissioner of Police or his designee may revoke, deny, or restrict Police related off-duty employment if it is deemed to be in the best interest of the Police Force. (Section II, para. 2.1)

Having examined the developments and characteristics of the industry, we move on to examine the legal and policy framework governing the private security industry.
Policy and legal framework

Control of the private security industry can be achieved through passage and implementation of effective legislation and state establishment of rigorous oversight mechanisms to enforce those laws and policies within the parameters of the legal framework, established policy guidelines, and relevant industry or state codes of conduct. In light of the precarious situation of St. Lucia regarding the passage but non-implementation of the existing legislation governing the industry, an analysis of the legal policy framework and regulation of the industry should consider:

- The Private Security Act No. 28 of 2006 and other relevant pieces of legislation such as the Firearms Act, No. 9 of 2003 and the Companies Act 1996;
- The status quo or current practice; and
- The potential impact of the 2006 Act and recommendations for moving forward in light of the failure to appoint the Authority.

Legislation

This section reviews the legal framework that governs the operations of the private security industry in St. Lucia, analyzes the effectiveness of the existing legal regime, and provides a brief comparison with other regimes in the Caribbean region. We pay special attention to the St. Lucia Private Security Authority, licensing of companies, and employment because of the profound impact proposed changes are intended to have on regulation and oversight of the industry. While firearms are not expressly provided for in the Act, we review the relevant provisions of the Firearms Act No. 9 of 2003 and opportunities for the formulation of firearms-related policies under the 2006 legislation. We also discuss key issues covered in the St. Lucia Labour Code 2006 and the relevant features of various pieces of Companies Acts and Regulations that have an impact on the industry.

PRIVATE SECURITY ACT NO. 28 OF 2006

The Private Security Act No. 28 of 2006 (the Act) was passed in the House of Assembly and House of Senate on 27 June and 20 July 2006 respectively, and assented to by the Governor-General on 5 October. The Act provides for the establishment of the Private Security Licensing Authority, the function of which is to establish regulations/guidelines and monitor the industry. However, at the date of writing, the Authority had not been installed, rendering the legislation largely ineffective. Although the Authority is similar to the Boards in St. Kitts and Nevis (Section 3(1) Private Investigators and Security Guards Act No. 5 of 2004) and St. Vincent and the Grenadines (Section 3(1) Private Investigators and Security Guards Act 2003), the pieces of legislation that established the Boards differ from the Act because they detail the regulations or guidelines for the industry and assign responsibility for oversight and enforcement.

The 2006 St. Lucia Act mandates the Authority to formulate rules and regulations in addition to policing the industry. Additionally, the Act is silent on issues such as the minimum qualifications for employment in the industry; wages; powers of officers to carry firearms; displaying of identification cards and badges, or mandatory production of identification cards to members of the public and police officers; and whether or not uniforms are mandatory. The Act also contains no provision for the training in, use of, or carrying of firearms (see Table 14). However, the Firearms Act No. 9 of 2003 regulates the issuance, transfers, inspection, and licensing of firearms issued to private security companies.
Table 14: Comparison of legislative provisions across Caribbean jurisdictions

<table>
<thead>
<tr>
<th>Provisions</th>
<th>Antigua &amp; Barbuda</th>
<th>Barbados</th>
<th>Bahamas</th>
<th>Belize</th>
<th>Guyana</th>
<th>Jamaica</th>
<th>St. Kitts &amp; Nevis</th>
<th>St. Lucia</th>
<th>St. Vincent &amp; Grenadines</th>
<th>Trinidad &amp; Tobago</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mandatory licence to operate a private security company</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Powers of private security officers</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Permission to carry firearms</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Mandatory display &amp; production of identification</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Mandatory uniforms</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Definition of private security officer &amp; private investigator</td>
<td>✓</td>
<td></td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Mandatory training for private security officers</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

Source: Developed by Sheridan Hill

DEFINITION OF SECURITY
Section 9 of the Act establishes the parameters for the services deemed to be security services. According to section 2(1) of the Act, a “security service” includes one or more of the following:

a) Protecting or safeguarding a person, an animal, or property in any manner;
b) Providing a service aimed at ensuring order and safety on premises used for sporting, recreational, entertainment, or other similar purposes;
c) Performing the functions of a private investigator;
d) Providing training or instruction in security services;
e) Installing, servicing, or repairing security equipment;
f) Performing the functions of manufacturing or producing keys, including electronic keys for access control;
g) Monitoring signals or transmissions from an electronic security system, satellite tracking device, a closed-circuit television, or other electronic monitoring device or surveillance equipment;
h) Giving advice in relation to a security service or on the use of security equipment;
i) Making a person or the services of a person available, whether directly or indirectly, for the rendering of a security service;
j) Managing, controlling, or supervising the rendering of a security service.

The definition mirrors some other pieces of legislation on private security and investigative services in Barbados (Private Investigators and Security Guards Act 373E 1985; sections 6, 7), the Bahamas (Private Security Act No. 210 1976, section 2), St. Kitts and Nevis (Private Investigators and Security Guards Act 2004, sections 6,7), and St. Vincent and the Grenadines (Private Investigators and Security Guards Act 2003, section 2(1)) and provides clear parameters to assist in ascertaining the boundaries of the industry. The Barbados legislation (section 11) places limits on the devices that can be used by private security investigators in the execution of their duties and may be helpful in assisting the Authority in drafting appropriate guidelines on this issue.
ESTABLISHMENT OF A PRIVATE SECURITY AUTHORITY

Arguably, the most sweeping change in the status quo proposed by the 2006 Act is the provision for the appointment of the Private Security Authority under section 4. Among the many functions of this body, discussed below, are its critical role in providing advice to the Minister of Internal Security on the suitability of persons applying for licences to operate private security companies, regulation and oversight of the industry, and the maintenance of a register of private security companies.

The establishment of the Authority is provided for in section 4(1):

There is to be established the Saint Lucia Private Security Authority which shall be a body corporate to which section 19 of the Interpretation Act, Cap. 1.06 applies.

The composition of and eligibility for appointment to the Authority are provided for in section 4(2) and (3):

(2) The affairs of the Authority shall be administered by a Board that subject to subsections (3) and (4) shall comprise the following five members—
(a) A Chairperson;
(b) A Deputy Chairperson; and
(c) Three other members; appointed by Cabinet, after consultations with the Commissioner of Police and the private security business community.

(3) The persons eligible for appointment pursuant to subsection (2) shall have a high professional integrity and experience in at least one of the following areas—
(a) Security or defence;
(b) Law or law enforcement;
(c) Finance or commerce;
(d) Consumer affairs.

The composition of the Authority is similar to its counterparts in Barbados (Schedule to section 3[2]), St. Kitts and Nevis (Schedule to section 3[2]), and St. Vincent and the Grenadines (Section 3[2]), which bring together various stakeholders in the private security industry.

The functions and powers of the Authority are set out in section 5 of the Act. Subsection 1 states that the Authority shall exercise the powers given to and perform the duties imposed on the Authority pursuant to this Act or any other law in force in St. Lucia including the following:

a) Receive and consider applications for the grant or renewal of licences for the carrying on of a private security business;
b) Make recommendations to the Minister for the granting or refusal of applications made pursuant to paragraph (1);
c) Consider the operation of any enactments that relate to or in any way affect the security services and make to the Minister—
   i) Such representations with respect to matters of general concern arising in connection with the operation of those enactments; and
   ii) Such recommendations for the extension of modification of those enactments; as the Authority thinks fit;
d) Establish and maintain a database of information necessary for the regulation of security services;
e) Promote public awareness concerning security services;
f) Identify additional research and development resources relating to security services;
g) Determine a claim by customers against a licensee in accordance with the terms of the licence in the event that the customer and the licensee have not been able to resolve the claim;
h) Advise the Minister on the standards, codes of practice, and Regulations to be prescribed;
i) Administer the provisions of this Act and the Regulations.
According to sections 22 and 23 of the Act, funding for the Private Security Authority and remuneration of the Board of the private security authority are to be allocated by parliament.

**LICENSING OF PRIVATE SECURITY COMPANIES**

Another significant change proposed by the legislation is the mandatory licensing of private security companies, which is not currently required. The Act requires private security companies to submit their application to the Licensing Authority. However, the Minister of Internal Security has the ultimate decision-making power as per section 5(1)(a) previously discussed. In that regard, the Authority acts as an advisory body to the Minister.

With respect to the operation of a private security company, section 30- (1) states:

A person shall not carry on a private security business unless that person is the holder of a valid licence issued pursuant to this Act.

Further, section 31 states:

For the purposes of this Act, the Minister may by Order published in the Gazette, establish—

(a) categories of licences;
(b) classes of licences within each category of licence; and
(c) the terms and conditions to be complied with by the licensee for each category or class of licence;

Having regard to the types of security services that each category or class of licence will authorize in the conduct of private security business.

Based on the provision of section 31, it is clear that the various classes and categories of licence will be published by the minister in the Gazette. While it is uncertain from the legislation who will determine the various classes and categories, it appears, based on the expressed role of the Authority in section 5 of the Act, that this determination will be done by the Minister on the Authority’s advice.

In addition to the mandatory licence requirement above, the Act expressly preserves the applicability of other laws of St. Lucia to such licences and makes special provisions for private security companies already in operation and applications by former police officers, and creates new obligations with regard to professional indemnity insurance, third party risks, and transfers of licence. For example, section 32 ensures that the Act shall not have the effect of dispensing with the necessity of obtaining permission where such permission is required pursuant to any other law in force in St. Lucia. Section 33 provides a two-month timeframe and conditions for companies already functioning at least 12 months before implementation of the Act to obtain a licence, while section 37 outlines the procedure of referring applications to the Commissioner of Police when former police officers want to obtain a licence and Section 42 describes the process for issuance and form of the licence.

The requirement for equity capital of at least $25,000\(^{20}\) is stated in Section 43; professional indemnity insurance and third-party insurance\(^{21}\) are provided for in section 44. Finally, section 45(1) ensures the transfer of licence must not be done without prior written consent of the Minister acting on the advice of the Authority and such transfer must not be contrary to the public interest or constitute a breach of national security (section 45[2]).

These provisions provide a number of safeguards regarding the issuance and transfer of licences of private security companies that, if implemented, can significantly improve regulation of the industry. It is also flexible as it strikes a balance between the need for immediate compulsory registration for new companies and provides a grace period for some companies already in existence. The Act also outlines the procedure to transfer licences. Moreover, it ushers in a new era of equity capital and insurance requirements that should act as an additional filtering process for unsuitable applicants, thereby improving regulation as well as the status of the industry.
REGISTER OF RECORD OF COMPANIES

The Act proposes key changes in the maintenance of a register of records of companies not currently in existence and inspection of the register by members of the public. Section 53(1) provides:

The Authority shall, subject to subsection (2), in the prescribed form, form and maintain a register of all licensees.

(2) The Authority shall ensure that the register contains the following particulars that must be recorded for each licensee—
(a) the name of the licensee;
(b) the address of the licensee, which satisfies the prescribed requirements;
(c) the category and class of the licence;
(d) the date of the enquiry of the licence;
(e) the terms and conditions of the licence;

(3) The Authority shall allow a person to inspect the Register and make a copy of any part of the Register on payment of the prescribed fee.

Section 53 therefore improves the recordkeeping and monitoring functions of the state as well as access to the register by members of the public.

AUTHORITY TO MAKE REGULATIONS

It is important to note that the 2006 Act expressly provides guidelines for keeping records of private security companies, categories and classes of licence, transfer of licence and records, codes of conduct, regulation and oversight, and standards pertaining to the industry. However, while it does not expressly provide for training and recruiting, the Authority has the power to establish such guidelines. The Authority also has the power to establish guidelines on issues such as identification badges, ID cards, and powers of arrests, if it so desires.

Section 55 provides:

(1) The Minister may, after consultations with the Authority, make Regulations for the purpose of giving effect to the provisions of this Act;

(2) Without prejudice to subsection (1) the Minister may, after consultation with the Authority, make Regulations, particularly—
(a) relating to any category of licence established pursuant to section 31;
(b) to prescribe the forms required pursuant to the Act;
(c) to prescribe the fees payable pursuant to this Act;
(d) to specify qualifications, training, or experience required for any category of licence established pursuant to this Act;
(e) to prescribe codes of conduct and codes of practice to be observed by licensees;
(f) to prescribe the oath of secrecy for members of the board and members of staff of the Authority pursuant to section 14;
(g) to prescribe the procedures of the Appeals Tribunal established pursuant to section 54;
(h) to set standards relating to security service.

LICENSING OF FIREARMS

Not all private security companies in St. Lucia provide armed services. However, those that provide such services must comply with the requirements of the Firearms Act No. 9 of 2003. To provide armed services, companies must apply to the Commissioner of Police for a Firearms Licence to use firearms. According to section 4(4) of the 2003 Act, a firearms licence may be granted or renewed if the appropriate authority is satisfied that the applicant:

1) is qualified or competent to hold the licence applied for and has completed a course in firearms and ammunition safety;
2) holds a certificate of competence, obtained from a designated institution;
3) has good cause for purchasing, acquiring, or having in his or her possession the firearm or ammunition;
4) is not a prohibited person under section 11;
5) has good knowledge of the law in force in St. Lucia relating to firearms and ammunition.

Additionally, the Firearms Act No. 9 of 2003 requires that granting the licence shall not endanger the public or the peace and that the applicant has made adequate provision for keeping the firearm and ammunition in a secure place when not in use. According to the Act, a security firm may apply for a gun licence under either of two categories: the Firearm user licence and Firearm user (employee) sub-licence.

The firearm user licence authorizes the holder to use, possess, purchase, or acquire, in accordance with the terms thereof, the firearm or ammunition identified or defined in the firearm user licence (13:2). The appropriate authority may authorize any employee specified by the holder to carry or use the firearm or ammunition to, from, or on premises belonging to the holder and the names of such persons (hereinafter referred to as authorized persons) shall be endorsed on the firearm user licence (13:3). The holder of a firearm user licence may have the licence amended by replacing the names of authorized persons endorsed thereon (13:5). The appropriate authority shall issue and sign a certificate stating that an authorized person or persons named is/are entitled to carry or use such firearm or ammunition to which the firearm user licence relates and the duration of such entitlement (13:6).

The firearm user (employee) sub-licence in section 20(a) states: “a person who is acting with the written consent of the holder of a firearm user licence in respect of a particular firearm specified in the firearm user licence may apply to the appropriate authority for a firearm user (employee) sub-licence which shall allow such person to keep, carry, and use in connection with the business of the holder of the firearm user licence that particular firearm or ammunition”; and in section 20(b), “the appropriate authority may grant the firearm user (employee) sub-licence subject to subsection (2).” Therefore, employees who are to carry firearms in the execution of their duties are issued a user permit by the Commissioner of Police on behalf of the company.

The Firearms Act No. 9 of 2003, under Part II, paragraph 8, subparagraphs 1a-b provides the conditions under which the licence may be suspended as follows:

The appropriate authority may suspend with immediate effect any licence if in his or her opinion it is in the public interest to do so or pending the outcome of any proceedings against a holder— (a) pursuant to the provisions of this Act; (b) pursuant to the provisions of any other law in force in Saint Lucia where the holder is charged with an offence in which he or she uses a firearm or ammunition in the course or furtherance of the commission of the offence.

Part II, Section 8(2) states that in the above case, the appropriate authority shall write the holder of the licence informing him/her of the suspension and the holder of the licence shall return the licence and the firearm or ammunition to which the licence relates to the appropriate authority within seven days of the delivery of the notice.

Section 9 provides conditions for the revocation of the licence if:

(a) the appropriate authority is satisfied that the holder—(i) is prohibited from possessing a firearm or ammunition under section 11; (ii) has intemperate habits or is of unsound mind; (iii) is under the age of eighteen; (iv) is for any reason considered unfit to be entrusted with a firearm;
(b) the holder fails to comply with a notice under subsection (2); (c) the holder is charged with or convicted of an offence in which the use of a firearm or ammunition is an element of the offence; (d) the holder has ceased to be a member of a shooting club where he or she was licensed for that purpose; (e) the holder fails to comply with any of the provisions in Parts IV, V and VI.
When the service of the private security officer is terminated, companies terminate the permit. Guardsman reports that the company may recommend that the user permit be withdrawn for two reasons: if the employee’s services are terminated; and if the person is deemed to be no longer suitable to carry the firearm, for example, if the person violates the company’s policies. When this happens, the company writes to the Commissioner of Police requesting that the user permit be withdrawn.  

The Private Security Act No. 28 of 2006 and the Firearms Act No. 9 of 2003 contain no provisions on such issues as firearm quotas, use, and disposal of or transfer of firearms and ammunition in cases of mergers and acquisitions by other companies, and decommissioning and destruction when the firearms are no longer usable. These gaps provide opportunities for the Private Security Authority, when appointed, to develop and implement guidelines for the operation of the industry.

**EMPLOYMENT**

There are no specific regulations in the Private Security Act No. 28 of 2006 pertaining to the wages and employment of private security personnel. Whereas the St Lucia Labour Code of 2006 covers private security officers in a general sense, specific wage and employment provisions are not expressly stated in the Private Security Act of 2006 and the Private Security Authority, which is authorized to make such regulations, has not been appointed. Section 27 (1) of the St. Lucia Labour Code of 2006 provides for a 40-hour week for workers and no more than six consecutive days of work in the week for no more than eight hours a day, although the worker may agree to flexible working hours as long as they do not exceed forty hours per week. For shift work, section 30(1) states that an employer and employee may, in a contract of employment, agree to the working of split shifts by an employee within a 12-hour period; section 30(2) states that an employer may require a shift employee to work occasional shifts of a duration of no more than two consecutive eight-hour shifts in an emergency, or in a situation where such work is due to the absence of another employee scheduled to take over the shift. And Section 30(3) provides that “where an employee works two consecutive occasional shifts as stated in (2) above, he or she shall not be required to work for another period without a minimum of eight hours rest immediately following the second occasional shift.”

*Current practice*

**LICENSING AND REGISTRATION**

Private Security Companies are registered with the Registry of Companies under section 4(3) of the Companies (Amended) Act of 2004. The interested party must submit an application to the Registrar of Companies for a name search through a lawyer or the Small Business Development Unit (SBDU) to ascertain if the company name being submitted already exists. Subsequently, the party submits the following documents to the Registrar of Companies to obtain 1) a Certificate of Incorporation, 2) Articles of Incorporation, 3) Notice of Address, 4) Notice of Directors, and 5) a Statutory Declaration. The company is subsequently registered by name rather than by the type of business. Therefore, unless the recorded name of the business refers to the nature of the business, the state cannot track the number of registered private security companies. Thus state monitoring, regulating, and maintenance of records of the total number and details of private security companies are virtually impossible.

The procedures for establishing private security companies in St. Lucia are the same as in other Caribbean countries such as Trinidad and Tobago, where there is no single authority.

Foreign firms wishing to operate a private security company in St. Lucia must undergo an additional two-stage process and comply with the requirements of the International Business Companies Act 2004 and Regulations. First, they must apply for a trade licence and second, apply, as do other categories of companies, to the Secretary of the Trade Licence Advisory Board at the Ministry of Commerce, Industry and Consumer Affairs. Applicants are to provide the following documents for the application process:
1. Letter of reference from applicant’s bank(s) in St. Lucia and overseas
2. Certificate of Character (local and overseas)
3. A copy of the business plan.

EMPLOYMENT
Despite the lack of provisions regarding employment criteria in the 2006 Act, the current practice sees the industry employing persons who are generally above 18 years of age; nationals of St. Lucia; and who produce a certificate of character from the Royal St. Lucia Police Force that indicates they have no criminal record, appear to be of good character based on background checks, and, in many instances, takes into consideration previous law enforcement experience.

The lack of key provisions on employment in the Act is a major point of departure from other pieces of legislation in the region (see Table 14). Other Caribbean countries with private security legislation have specific provisions for employment. These requirements relate to citizenship, age, Certificate of Character, education, training, uniform, badges and identification cards, and use of firearms. In this regard, the St. Lucian model is unique in the region. In light of the implications for the implementation of the Caribbean Single Market and Economy, the Authority may find it helpful to include guidelines on nationality (St. Lucia and CARICOM) to address these concerns.

TRAINING
There are no guidelines for general training of private security officers in the Private Security Act No. 28 of 2006. However, the Firearms Act No. 9 of 2003 provides that firearm training on handling and safety is mandatory for the issuance of a firearm licence by the police. Officers are trained in the handling, safety, and proper recourse to the use of firearms by three authorized organizations: GARInc, the Shooting Association (St. Lucia), and the St. Lucia Defense Club. The RSLPF certifies the competencies of these training providers. The training period combines theory and practice of handling and use of firearms. The training organization forwards the results of the training to the police and the certificate is issued to the user as an employee of this particular company.24

There is no standard practice regarding in-house training and company policy varies across the industry. Some companies provide basic security training of varying lengths to their officers. Guardsman reported that, after the police have provided the provisional licence, in-house training is conducted by one of the certified training providers mentioned above. The Private Security Training Academy, which is not currently operational, is mandated to deliver training courses for security officers. The courses cover a wide range of subjects including basic security officers training, security supervisor training, advanced or site-specific training, and security management (Phillips 2010).

Additionally, general career development for private security officers is being offered as a regular course in the Department of Continuing Education at the Sir Arthur Lewis Community College. The course “Introduction to Security” was started at the behest of PSC owners who requested certification for private security officers. Initially, the course was heavily subscribed because companies insisted that prospective employees complete the program. However, in recent years, there has been a considerable decline in the enrolment for the course. The course is now being offered as part of the criminal justice program and remains open to prospective and active private security officers.25

WAGES
Although the salaries of private security officers are governed by the labour laws of the country, which provide for a minimum wage, the average rate of pay of a private security officers varies from EC$3.00 to EC$5.00 per hour. The rate depends on a variety of factors, including the private security company in question and whether the officer performs armed or unarmed duties, cash-in-transit functions, supervisory functions, or monitoring and response duties. Interestingly, two companies reported that officers receive higher wages when the company secures more lucrative contracts.
FIREARMS
The authority of private security officers to carry firearms while on duty is not expressly provided for in the Private Security Act No. 28 of 2006. This is not an unusual feature of legislation by Caribbean countries as well as other countries in the hemisphere. A UNLIREC report (2011) highlighted the fact that in many countries the regulation, possession, carrying, and use of firearms by private security companies and private security agents while on duty is not regulated under a special regime or even within the acts that would otherwise regulate private security companies. This is also reflected in Table 14. In the case of St. Lucia, the Firearms Act No. 9 of 2003 makes provision for the issuing of a licence to carry firearms to various categories of persons. Private security officers are authorized to carry firearms under section 14 of the Act mentioned above. Training in the handling and safety of, and lawful recourse to, the use of firearms is provided by the certified authorities mentioned earlier.

The issue of firearms presents another opportunity for the incoming Authority to make a positive impact on the status quo by making effective regulations or guidelines.

The potential impact of the legislation and key provisions

LICENSING AND REGISTRATION
While the Act proposes that new private security companies make an application to the Minister of Internal Security, the application must first be submitted to the Private Security Authority and recommended by the Authority appointed under the Act. This licensing and registration proposal is a departure from the status quo. The Authority, therefore, will act as a filtering mechanism for applications and maintain records of the various companies and the classes and categories of licences issued to private security companies, thereby improving the ability to monitor developments in the industry.

WAGES
While the Act is silent on the issues of wages, two recent developments are relevant. Implementation of the Labour Code of St. Lucia 2006 may bring some stability to wages in the industry, if a minimum wages order affecting the industry is declared. And the Private Security Act No. 28 of 2006 provides mechanisms for making regulations for the industry, which may include wages. These developments, coupled with the maintenance of records of all private security companies, which will be maintained by the Authority, may have a positive impact on the payment of fixed wages as well as monitoring and enforcement of the payment of those wages in the industry.

TRAINING AND RECRUITING
Under section 55, the Act provides the Minister with the power to issues regulations on qualifications, training, and experience, based on advice from the Authority. Therefore, despite the absence of specific expressed provisions, the power to make such regulations exists. While it would be speculative to predict what the guidelines would be, the implementation of such guidelines would add some level of certainty in recruiting and training criteria for the industry and, subject to the level of enforcement and oversight mechanisms, has the potential to improve the level of professionalism in the industry.

FIREARMS
There are no expressed provisions in the 2006 Act on issuance and carrying of firearms while on duty. This is similar to other countries in the region as mentioned before. However, the Firearms User’s Licence provided for in the Firearms Act No. 9 of 2003 covers provisions on handling, possession, purchase, and the procedure to acquire firearms. Additionally, any apparent shortcomings of the 2003 Act may be remedied by the power vested in the Minister to make regulations for the industry under section 55 of the 2006 Act. The regulations and code of conduct are discussed below.
**Regulation and oversight**

**INDUSTRY**
There are no internal mechanisms for industry oversight, very few instances of corporate social responsibility, and no international initiatives that are binding on, or adhered to by, the industry in St. Lucia. There are no industrywide codes of conduct and self-regulation in the local industry. The lack of internal regulation in St. Lucia is indicative of the Caribbean reality.

However, there are private security associations in some countries, such as the Jamaican Society for Industrial Security (JSIS) and the Security Managers Association of Trinidad and Tobago (SMATT) and Security Owners and Managers Association of Trinidad and Tobago (SOMATT). Some PSC interviewees indicated that self-regulation would have a positive impact on the industry. It is noteworthy that the larger and more prominent companies appear to prefer state regulation to internal regulation.

**STATE**
There is no state entity with exclusive oversight responsibility for the regulation of the local private security industry such as the Private Security Regulation Authority (PSRA) in Jamaica. Therefore the appointment of the Private Security Authority, as mentioned before, will be a significant step toward regulation of the industry. Recordkeeping by the state is a challenge and there are no reporting obligations on individual companies, although some companies report that they are subject to monitoring and inspection of their firearms and ammunition. Additionally, there appears to be no regulation of mergers, acquisitions, and change of ownership. However, section 4(5) of the Firearms Act No. 9 of 2003 requires the holder of a firearms licence to forward to the appropriate authority (the police) every three months a true extract of transfers, purchasers, and quantities. The issue here is one of effective oversight and enforcement of the requirements of the legislation because the existing controls appear to be adequate. Enforcement, on the other hand, might be problematic.

Notwithstanding the delay in appointing the Authority, with the passage of the 2006 Act, St. Lucia joins Antigua and Barbuda, Barbados, Guyana, Jamaica, St. Kitts and Nevis, St. Vincent and the Grenadines, and Trinidad and Tobago as the other English-speaking Caribbean countries with legislation governing the private security industry (see Table 15). State oversight of the industry varies widely across the region in terms of legislation and oversight authority, as is shown in Tables 16-19.

**Table 15: Private security legislation in the Caribbean**

<table>
<thead>
<tr>
<th>Country</th>
<th>Legislation</th>
<th>Year passed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trinidad and Tobago</td>
<td>Supplemental Police Act Ch. 15.02</td>
<td>1906</td>
</tr>
<tr>
<td>Bahamas</td>
<td>Private Security Act 210</td>
<td>1976</td>
</tr>
<tr>
<td>Jamaica</td>
<td>Private Security Regulation Authority Act</td>
<td>1992</td>
</tr>
<tr>
<td>Belize</td>
<td>Private Security investigative Services (Control) Act Ch. 138-01</td>
<td>2003</td>
</tr>
<tr>
<td>St. Vincent and the Grenadines</td>
<td>Private Security Act</td>
<td>2003</td>
</tr>
<tr>
<td>Antigua and Barbuda</td>
<td>Private Security Act</td>
<td>2006</td>
</tr>
<tr>
<td>St. Lucia</td>
<td>Private Security Act no 28, 2006</td>
<td>2006</td>
</tr>
<tr>
<td>Guyana</td>
<td>Private Security Services Act No. 32</td>
<td>2009</td>
</tr>
</tbody>
</table>

Source: S. Hill 2010
In his unpublished Master’s thesis, Joseph (2007) refers to five models of regulation of the industry proposed by George, Button, and McGee (2007), ranging from i) Comprehensive Wide, ii) Comprehensive Narrow, iii) Minimum Wide, iv) Minimum Narrow, to v) Non-Interventionist. He argues that the Comprehensive Wide model should be applied in St. Lucia. According to Joseph, this model is most popular in the European Union countries and seeks to establish wide-ranging regulations for all sectors of the industry. Hill (2010) identified four levels of regulation in the Caribbean region, depending on the structure, size, and focus of the entity responsible for regulation and oversight of the industry; and whether or not there is legislation that provides for an authority to perform this function.

**Level One: Jamaica**

According to Hill (2010), Jamaica’s Private Security Regulation Authority can be considered the strongest model of state oversight because Jamaica is the only country that has a separate state-funded entity with exclusive responsibility for regulation and oversight of the industry. The PSRA Act also requires both private security officers and companies to register with the PSRA. Jamaica’s PSRA and strong legislation, which require both company and guards to be registered, place it in level one (see Table 16). Moreover, Burt (2012, 17) argues that Jamaica “has the best regulated industries in the region.”

**Table 16: Level-one model of state regulation**

<table>
<thead>
<tr>
<th>Country</th>
<th>Regulation model</th>
<th>Composition of regulation body</th>
<th>Challenges</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jamaica</td>
<td>Private Security</td>
<td>State entity with a 9-member Authority and staff with</td>
<td>a) Too focused on larger companies;</td>
</tr>
<tr>
<td></td>
<td>Regulation Authority</td>
<td>exclusive regulation and oversight function</td>
<td>b) Lacks resources to effectively police smaller companies</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>c) Too focused on fee collection</td>
</tr>
</tbody>
</table>

Source: S. Hill 2010

**Level Two: Barbados, St. Kitts and Nevis, St. Vincent and the Grenadines, St. Lucia**

The remaining Caribbean countries have lower levels of regulation and state oversight. Authorities and Boards exist in Barbados, St. Kitts and Nevis, and St. Vincent and the Grenadines, which are placed in level two. The Private Security Authority proposed in section 4 of the 2006 Act places St. Lucia in this level (see Table 17).

**Level Three: Antigua and Barbuda, Bahamas, Belize, Guyana, Trinidad and Tobago**

Countries such as Antigua and Barbuda, the Bahamas, Belize, Guyana, and Trinidad and Tobago, with single state officials with limited expressed legal responsibility and resources to police the industry, are placed in level three. These officials include the Commissioner of Police in Antigua and Barbuda, Belize, Guyana, and Trinidad and Tobago and the Minister of National Security in the Bahamas (see Table 18).

**Level Four: Dominican and Grenada**

Dominica and Grenada are the only two English-speaking Caribbean countries with no private security legislation governing the industry and, therefore, have the lowest level of regulation.
Table 17: Level-two model of state regulation

<table>
<thead>
<tr>
<th>Country</th>
<th>Regulation model</th>
<th>Composition of regulation body</th>
<th>Challenges</th>
</tr>
</thead>
</table>
                         2. PS Legal Affairs COP  
                         3. 3 members appointed by the minister from the private sector (section 3 of Act 372E) | Lacks the capacity to effectively monitor the operations of the industry to effectively enforce legal requirements |
| St. Kitts and Nevis | Private Investigators and Security Guards Licensing and Advisory Board            | 1. PS Ministry of National Security  
                         2. PS Ministry of Legal Affairs  
                         3. COP  
                         4. 3 members appointed by the minister | Same as above |
| St. Lucia           | St. Lucia Private Security Authority, Section 4                                   | 1. A Chairperson  
                         2. Deputy Chairperson  
                         3. 3 other members  
                         All appointed by Cabinet in consultation with COP and private security sector | Same as above |
| St. Vincent and the Grenadines | Private Investigators and Security Guards Licensing and Advisory Board | 1. PS Ministry of National Security  
                          2. Senior legal counsel of the Ministry of Legal Affairs  
                          3. COP  
                          4. 4 representatives from the private sector  
                          5. 2 persons from a company or an agency representing security guards and private investigators | Same as above |

Source: S. Hill, 2010

While the St. Lucia model of state oversight mirrors some of the other territories with entities comprised of state and private sector officials appointed by the state, the nature and extent of the onerous responsibility of the St. Lucia Private Security Authority is where the models part ways. Legislation for both St. Kitts and Nevis and St. Vincent and the Grenadines contains provisions relating to terms and conditions of employment, training and powers of security officers while on duty, identification badges, and training. However, the 2006 Act for St. Lucia contains no such provisions, but leaves such responsibility to the St. Lucia Private Security Authority, appointed under section 4 of the Act. It is arguable that the imposition of such onerous duties on the Authority, in addition to effectively policing the industry to ensure compliance with the specific provisions of the legislation and any other rules, guidelines, and code of conduct that may be established under the 2006 Act, may be factors contributing to the delay in appointing the Authority and implementing the Act.
Table 18: Level-three model of state regulation

<table>
<thead>
<tr>
<th>Country</th>
<th>Regulation model</th>
<th>Composition of regulation body</th>
<th>Challenges</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antigua and Barbuda</td>
<td>Single entity</td>
<td>Council</td>
<td>Same as level 2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Not dedicated to private security industry</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Other more demanding priorities</td>
</tr>
<tr>
<td>The Bahamas</td>
<td>Official</td>
<td>Minister</td>
<td>Same as above</td>
</tr>
<tr>
<td>Belize</td>
<td>Official</td>
<td>Commissioner of Police</td>
<td>Same as above</td>
</tr>
<tr>
<td>Guyana</td>
<td>Official</td>
<td>Commissioner of Police</td>
<td>Same as above</td>
</tr>
<tr>
<td>Trinidad and Tobago</td>
<td>Official</td>
<td>Commissioner of Police</td>
<td>Same as above</td>
</tr>
</tbody>
</table>

Source: Hill 2010

Table 19: Level-four model of state regulation

<table>
<thead>
<tr>
<th>Country</th>
<th>Regulation model</th>
<th>Composition of regulation body</th>
<th>Challenges</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dominica</td>
<td>Nil</td>
<td>N/A</td>
<td>Urgent need for regulation</td>
</tr>
<tr>
<td>Grenada</td>
<td>Nil</td>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>

Source: Hill 2010

INTERNATIONAL RULES AND REGULATIONS

The Montreux Document creates a new regime of responsibilities and obligations of private military and security companies in armed conflict. However, its application is limited to one country (Haiti) in the current Caribbean context and does not apply to St. Lucia. Therefore, there are no international rules that are binding on the local industry. Regulation is viewed by many as a positive step for the industry; however, the industry appears to be divided on the degree to which it should be regulated and whether state or internal/self-regulation is better for the industry. Of the eight companies that responded to the questionnaires, four companies, notably the more prominent ones, agreed on internal regulation while the other half felt that state regulation would be more effective.

Impact of the 2006 Private Security Act on regulation and oversight

It appears that implementation of the 2006 Act will have a profound impact on regulation and oversight of the industry, as there are numerous expressed provisions that address the shortcomings of the status quo. Additionally, the Act also gives the Minister of Home Affairs power to make regulations, on the advice of the Authority, for the operation of the industry. However, as promising as the provisions of the Act appear, oversight and enforcement will depend on the degree to which there are effective enforcement mechanisms to support express provisions in the Act and any related regulations that might be made by the Minister. In this regard, it is noteworthy that the Jamaican model lacks effective oversight and enforcement mechanisms, despite comprehensive provisions in the PSRA Act and the powers granted to the Private Security Regulation Authority.

The 2006 Act provides for implementation of codes of conduct, establishment of a register with the details of all private security companies, establishment of guidelines for the operation and regulation of the industry with respect to qualifications and experience of licensees, and a process for receiving and approving applications. In light of the presence of these provisions in the 2006 Act, which have the potential to enhance the regulation and professional image of the local private security industry, the successful implementation and enforcement of these provisions will have a profound effect on the regulation of the industry.
Having examined the current practice in the operations of the private security industry and the attempts at regulating the industry, we make some preliminary conclusions and recommendations with particular emphasis on regulation and oversight.

Conclusions and recommendations

The lack of implementation of the existing private security legislation and deficiencies of the Firearms Act No. 9 of 2003 and, to a lesser extent, the Companies Acts and Regulations leave the industry unregulated, posing a security risk to St. Lucia. While attempts have been made by some sections of the private security industry to improve organization and development of the industry, these efforts have not produced significant results. The current method of registration of companies makes it challenging to obtain the most basic fact about the private security sector: the number of legitimate companies in operation. Thus, any monitoring of the industry is impossible. The number of private security officers is growing rapidly; some bear arms and guard sensitive sites and valuable property. While there are instances of companies having credible practices, the lack of accountability and transparency of the operations of the private security industry as a whole, derived from a lack of oversight, calls into question the legitimacy of the private security industry as a credible provider of security services.

An interesting element of the private security industry relates to the increasing number of women employed as private security officers. It has been estimated that the ratio of male to female private security officers is 80:20.26 Traditionally, a private security officer, especially a watchman, was male. Today more women with families are employed in the industry, working eight- and 12-hour shifts. While the number of women affected is relatively small, some women have indicated that long shifts reduce their ability to supervise their families and households.

Despite current challenges the growth of the private security industry has provided employment for many people. A civil society source reported that many employees dismissed from civil society organizations found employment in the industry.27 This means that people who would have otherwise been unemployed are now gainfully employed by private security companies. However, while some companies pay reasonable wages, some pay so little that employees find it difficult to sustain a decent lifestyle.

Recommendations for legal framework, regulation, and oversight

The legal framework, regulation, and oversight of the industry are all interrelated components of a continuum, with each part dependent on the others. This therefore implies that the legislation relating to the rules, regulations, and institution (and its role and function) must be present and functioning if the system is to be effective. Against that background our recommendations are focused on a) legislation and regulation and b) oversight and enforcement.

LEGISLATION AND REGULATION

The deficiencies in the various pieces of legislation designed to regulate the private security industry relate to three major issues. First, the passage but lack of implementation of the Private Security Act No. 28 of 2006 leaves the industry unregulated. Second, the Firearms Act No. 9 of 2003 lacks provisions for effective controls over quotas; mergers; and the acquisition, destruction, and decommissioning of firearms. Third, there is no provision in the company legislation to establish private security companies and allow the use of firearms by those companies. Our recommendations focus on the first two points, as the third can be subsumed under the first.

Recommendation #1

With respect to the Private Security Act No. 28 of 2006, we recommend that the state amend the current legislation or pass new legislation. In both instances the state should include the key regulatory issues (employment criteria, identification badges, powers of arrest, authority to carry firearms while on duty, etc.) in the legislation and leave the responsibility for oversight and enforcement to the Private Security Authority. Both options would alleviate the burden on the Authority of making rules and regulations in addition to providing oversight and enforcement of those regulations. We therefore expect these actions to simplify the legislation and expedite the appointment of the Private Security Authority, whose primary function would be to enforce the necessary regulatory framework.
**Recommendation #2**
The Firearms Act No. 9 of 2003 should also be amended to expressly provide for quotas and mergers, as well as the acquisition, decommissioning, and destruction of firearms. These provisions are not currently included in the Act. While there are general prohibitions relating to the sale, licensing, and possession of firearms under the Act, they do not inadequately address these specific concerns. And, while the current Private Security Act No. 28 of 2006 gives the Minister the authority to make regulations covering these issues, such authority should be expressly provided for in the Firearms Act No. 9 of 2003, which is the primary piece of legislation governing the control of firearms. Any other law or bylaw (as provided in the Private Security Act No. 28 of 2006) would simply reinforce the provisions of the Firearms Act.

**Recommendation #3**
We recommend that company legislation should contain express provisions relating to private security companies and the use of firearms. It should clearly identify the services that can be provided by these companies by referring to other applicable laws of St. Lucia, such as the Firearms Act No. 9 of 2003. This recommendation would be satisfied if the Private Security Act No. 28 of 2006 were to be implemented in its current form, thereby creating a separate system of registration, licensing, and maintenance of records of private security companies.

**Recommendation #4**
There should be clear guidelines on the renewal of licences for the operation of private security companies. The provision of a licence should not be for life, but should be subject to periodic review, after which the decision would be taken to either renew or not renew the existing licence.

**OVERSIGHT AND ENFORCEMENT**
Currently legislation covers the issuance of Firearms Licences to companies, Firearms User’s Licences, and the inspection of firearms owned by private security companies. Research did not reveal the level of enforcement. Our recommendations regarding oversight and enforcement relate to the current situation and the period after the Private Security Act No. 28 of 2006 is implemented in its current or an amended form.

**Recommendation #5**
We recommend increased vigilance by the police in enforcing the Firearms Act No. 9 of 2003, particularly inspections of firearms owned by private security companies. We also recommend improved monitoring of the firearms training given to applicants for the Firearms User’s Licence.

**Recommendation #6**
The future of oversight and enforcement in the industry depends on the adoption or amendment of the Private Security Act No. 28 of 2006. If the current Act is implemented in its original form, we recommend that the state provide the Private Security Authority with sufficient staff, funding, and resources to function effectively. This recommendation is made in light of the challenges experienced by Jamaica’s PSRA and other Caribbean countries with similar models of regulation. We recommend close collaboration between the state (Ministry of Home Affairs), police (the body responsible for enforcing key provisions in the Firearms Act No. 9 of 2003 vis-à-vis the industry), and the owners and operators of private security companies.

**Recommendation #7**
The Private Security Authority should establish a mechanism for determining the good character criteria of private security owners and managers. The definitions of a “fit and proper person” in legislation in Caribbean countries such as St. Vincent and the Grenadines may be helpful.

**Recommendation #8**
The Licensing Authority should establish fixed criteria for standards in security training. A training syllabus should be issued; specific institutions should be accredited by the Authority to conduct security training; and companies should be given a six-month timeframe after the Act is operational in which to comply with the training requirements.
CONSULTATION AND INFORMATION SHARING

Recommendation #9
Developing institutional structures to encourage and facilitate information sharing is important to reduce and possibly eliminate the entry of criminal elements into the industry. We recommend establishing a database in which companies will input employee information, including the records of all security officers whose services have been terminated for illegal activities or discreditable conduct. This information should be kept by the Private Security Authority and shared among registered private security companies, the police, and related agencies and departments. This would help to minimize the instances in which private security companies employ security officers whose services have been terminated by other companies for inappropriate behaviour.

Recommendation #10
Any amended or new legislation should be based on wide consultations with stakeholders in the private security industry.
Notes

1. This definition draws on definitions used by the following: Holmqvist (2007, p. 4), ASIS International (2009) and the international Code of Conduct for Private Security Providers (Switzerland 2010). The definition does not distinguish between those companies that focus on protective services (referred to as private security companies or PSCs in some of the literature) and those companies (referred to as private military companies or PMCs) that focus on services related to combat or military actions such as military training, intelligence, logistical support, and deployment of armed personnel in the battlefield. The former offer services related to traditional policing roles, while the latter offer services that involve more soldiering roles (Richards & Smith, 2007, p. 6). The majority of the PSCs in the Caribbean focus on protective services.

2. The 2005 Poverty Assessment Study defines the indigent as “persons whose daily average consumption is too low to guarantee adequate nutrition to maintain good bodily health.”

3. This comparison was made with caution considering that the census figures refer to households while cases reported to the police are of individuals. For example, Census figures would not capture several cases in one household.

4. Civil society interventions include the RISE Project established in July 2007. It is a nonprofit, nongovernmental, national organization aimed at healthy development of youth. RISE seeks to collaborate with and support other public and private agencies or individuals engaged in youth development. RISE has been described as an experiment in youth/community engagement for positive change. RISE has teamed up with ICAN (I Can Change a Nation) to reach out to young people throughout the country and is encouraging young people to join as membership is free (Kentish 2009). St. Lucia is also a participant in the D.A.R.E. Programme. There are programs in several schools on the island, where the police work with schools by engaging at-risk children in programs aimed at positive change.

5. Interview with former senior official of the Royal St. Lucia Police Force, April 2011.

6. Interview with John Lorde, Training Manager, Guardsman St. Lucia, June 18, 2013.

7. Interview with Carlyn Phillips, August 2011.

8. ASIS international is the preeminent organization for security professionals. Founded in 1955 ASIS is dedicated to increasing the effectiveness and productivity of professionals by developing educational programs and materials that address broad security interests.


10. Ibid.

11. Ibid.

12. One company in the “security controls and systems” category in the telephone directory is not registered. We found another operation not registered but not listed in the telephone directory that offers guard (unarmed) and patrol services to retail outlets. This is said with some degree of caution because it could also mean that the company may have registered under a new name. The Registry of Companies and Intellectual Property reported that it is a common practice for private security companies to operate illegally.

13. Interview with Senior Management, Guardsman Group, August 2011.

15. The names of companies are withheld for confidentiality purposes.


17. Interview with Senior Management of Guardsman (St. Lucia) Ltd., April 2011.

18. Note that this company does not offer guard services, but security control and systems.

19. “a) must be the prescribed form; b) should be issued on payment of the prescribed licensed fee to the Authority; c) clearly establish the category, class and scope of the licence; and d) include the terms and conditions, in addition to those provided for in this Act or the regulations, under which the licence is granted.”

20. “a) in the case of company shall maintain a fully paid capital; or b) in case of any other person must maintain in a bank account approved by the Authority.”

21. “in an amount approved by the Authority and with the insurer approved by the Authority.”

22. Interview with Senior Management, Guardsman Group Ltd, April 2011.

23. The Labour Code reportedly came into effect on August 1, 2012; however, no specific declaration on wages has been made. While there are many provisions on employment, they do not specifically relate to the private security industry and so its application to the industry is uncertain.

24. Interview with Senior Management, Guardsman Ltd, April 2011.

25. Information about the status of the course “Introduction to Security” was obtained during an interview with a senior official of the Royal St. Lucia Police Force, April 2011.

26. Interview with Ministry of Labour official, April 2011.

27. Interview with Brandon Antoine, Chairman of the St. Lucia EU Non State Actor Panel, August 2011.
References


Phillips, Carlyn, 2010. Paper prepared for the workshop launch of the research on the role and operations of private security companies in the Caribbean, University of the West Indies, November 19-20.


St. Lucia Air and Sea Ports Authority (SLASPA), n.d. The Saint Lucia Ports Police.


www.stlucia.gov.lc/docs/AssessmentOfPovertyInStLucia/Assessment_of_Poverty_in_St_Lucia_Volume_1_Main_Report.pdf.


List of interviewees


Antoine, Brandon. Chairman, St. Lucia EU Non State Actor Panel. August 2011.

Belrose, Fortuna. Deputy Permanent Secretary, Ministry of Home Affairs and National Security, April 2011.

Charles, Brian. Operations Manager, Guardsman, St. Lucia, August 2011.

Charles, Moses. Deputy Commissioner of Police (Operations), Royal St Lucia Police Force, St. Lucia, April 2011.

Francios, Cynthia R. Employment Officer, Ministry of Labour, St. Lucia, April 2011.


Lionel, Leo. Manager, G4S, St. Lucia, August 2011.

Lorde, John. Manager, Training and Operations Audit, St. Lucia, April and August 2011.

Phillips, Carlyn. Manager, Sentinel Security, St. Lucia, April and August 2011.

Phillips, Cuthbert. Former Commissioner of Police, Royal St. Lucia Police Force, St. Lucia, April 2011.

Regis, Ausbert. Former Commissioner of Police, Royal St Lucia Police Force; National Security Advisor to the Prime Minister, June 2013.
Private Security Companies in Trinidad and Tobago
Matthew Louis Bishop

Introduction

This paper is part of a broader project that aims to map the private security industry in three Caribbean territories: Jamaica, St Lucia, and Trinidad and Tobago (T&T). All three of these countries have seen precipitous rises in violent crime—and especially gun-related homicides—in the past decade or so, and they have all witnessed a similarly rapid increase in the size and importance of the private security industry. This has, moreover, incurred both widening and deepening elements: the industry has not only grown in absolute terms, but it has also expanded its reach dramatically, evolving to take on more—and often highly complex and sophisticated—functions.

These shifts, however, are poorly understood, both in the sense of the dearth of information that exists on private security in the Caribbean, as well as a lack of detailed research and analysis of wider implications. There is a crucial need for greater understanding of the consequences of the growth in private security companies (PSCs), not only in terms of the immediate impact upon crime and security, but also for the development of better regulation, the more effective operation of the public and private security apparatuses, and a clearer grasp of what these changes imply for the relationship between the state, providers of security, and the wider population.

Aims and objectives

The central purpose of this paper is to map the ways in which the industry has developed in T&T. In line with the counterpart reports on Jamaica and St Lucia, it aims to accomplish the following:

• To understand the forces that have shaped the industry’s development, and its relationship to the broader security frameworks in these countries and CARICOM;
• To map out PSC operations and review the extent and effectiveness of existing legislative and regulatory frameworks in case study countries;
• To promote the regulation of the private security industry;
• To inform and influence policy development by government and by the industry itself;
• To increase the capacity of Caribbean researchers to undertake work on security and small arms issues; and
• To promote learning among Caribbean and Canadian organizations.

T&T is a particularly interesting case study because, although the private security industry has grown and developed in similar ways to its counterparts in both Jamaica and St Lucia, it also exhibits some distinctive characteristics. The most important of these is the fact that, in contrast to PSCs in both St Lucia and Jamaica, which have highly developed legislation, the industry in T&T remains essentially unregulated. This is particularly striking given that T&T is one of the most economically developed countries in the Anglophone Caribbean, and it has the regulatory capacity to introduce legislation, arguably to an even greater extent than any of its neighbours.

Certain legal provisions govern one or more specific aspects of the operation of private security—such as that which pertains to precepts and firearms—but there is no overarching legal framework in which the industry is located. This is widely recognized as a serious deficiency and there have been numerous attempts to deliver legislation since the early 1990s. However, these have been consistently bedevilled, depending on the context, by a mixture of political inertia or the fall of governments at inopportune moments.
At the time of writing (July 2013) many observers, from both within the industry and government, were hopeful that legislation was close to coming before Parliament. The People’s Partnership (PP) coalition administration, which came to power in May 2010 and which comprised, inter alia, members of the United National Congress (UNC) and Congress of the People (COP), has been broadly committed to regulation of the industry.¹ During the first two years of the government’s term, significant work was undertaken on developing a regulatory framework, with wide-ranging input from stakeholders within and beyond the industry, and there is a degree of consensus surrounding its broad shape. However, many also believe that regulation of PSCs, while seen as critical, has never been high enough on any government’s agenda to actually have it driven through. A number of thorny tensions remain unresolved in the regulation of PSCs in T&T. These help to explain why legislation has been subject to interminable delays and they will be explored later in the report.

More immediately, the legislation has also been stymied by upheaval within the Ministry of National Security itself. Early on in the administration’s tenure, the biggest champion of legislation was Minister of National Security, Brigadier John Sandy. In mid-2012, Sandy left office to take up a diplomatic post in Geneva and this delayed legislation as his incoming successor, Jack Warner, reviewed the Ministry’s priorities. In early 2013, as many stakeholders were growing in confidence that legislation was finally forthcoming, Warner resigned from government. At present, therefore, it is hard to state with any confidence whether or not legislation is either likely or imminent.

Methodology and limitations

This study is based on the results of a wide-ranging desk review of both the academic literature pertaining to private security globally, as well as a detailed investigation of the existing legislation and trends within the industry in T&T specifically. It therefore includes data gathered from existing studies, academic books and articles, primary documents, and media reports.

The primary research was undertaken in three stages. First, stakeholders from across the industry were identified and 10 were interviewed in early 2013. The interviews followed a semi-structured format, which involved the exploration of issues relating to trends in the industry, the status of legislation and regulation, the use and regulation of firearms, as well as specific questions regarding the character and operation of firms and other interested organizations themselves. The second part of the primary research involved the distribution of the draft report to the stakeholder community at large. This was critical, since a number of those who were identified were unable to make themselves available for interview; this kind of follow-up permitted them to share their expertise by way of comment on the report. Finally, the University of the West Indies hosted a stakeholder workshop in June 2013, which brought together the authors of the reports, the team from Project Ploughshares, and a number of stakeholders—including, again, some who had not been interviewed in stage one—to discuss the core findings and further refine the studies.

There were a number of limitations to the research. Resource constraints meant that the sample of stakeholders was not comprehensive (although some clear trends certainly emerged from the research). Another issue related to the paucity of written information to draw upon: few published studies of the industry exist and almost no primary documents that are freely available or easily accessible give a clear indication of its size or composition. This in turn led to a degree of reliance on the insights and observations of industry stakeholders. This is, in many ways, not a bad thing, given the need for new primary research. However, it also means that much of the evidence presented is necessarily based on a degree of hearsay, something that is plainly apparent in the broad spectrum of figures that are advanced later in the report pertaining to, for example, the size of the industry, wages paid, and so on. Finally, given the nature of the research, some actors were understandably loath to offer detailed specifics, particularly about the operation of their own companies, if they were likely to be identified. So, in order to ensure that as much information was gleaned from the empirical research as possible, respondents were happy to be named in the report (see list at end), but only on the condition that their specific responses to questions were anonymous. Consequently, no specific reference is made to particular people, actors, or firms in the report, unless that information is publicly available or widely understood.
Trinidad and Tobago: National context and development

T&T is a twin-island state situated at the far south of the chain of islands that comprise the Caribbean archipelago. It is simultaneously one of the largest and most populous of the independent, Anglophone Caribbean countries and one of the most developed. Trinidad is by far the larger. The country has a land area of 5,198 km² (about half the size of Jamaica) and Tobago accounts for only about 300 km².

**Demographics**

Trinidad accounts for more than 90 per cent of the country’s population: more than 1.3 million people live on Trinidad, while just over 50,000 live on Tobago. The country is also distinctive in terms of ethnic composition. Because of the history of post-slavery indentureship, there are two main ethnic groups: people of Afro-Caribbean descent, colloquially referred to as Afro-Trinidadians; and people of East Indian descent, usually referred to locally as Indo-Trinidadians. Each group accounts for approximately 35 per cent of the overall population. A further quarter is officially considered to be of mixed heritage. T&T also has a number of significant minorities, including people of Chinese, European, and Middle Eastern descent. It should be noted that these categories are far from fixed: ethnic differences, while undeniably salient in general terms, are fraught with ambiguity. Trinidad (less so Tobago) is an extremely cosmopolitan society with a strong national identity; people have long mixed with each other through marriage.

Nonetheless, some broad demographic patterns can be discerned; again, these can only be advanced with the requisite degree of caution. One that is of critical concern for this study is that the primary areas where gun violence takes place—notably the Eastern districts of the capital, Port of Spain—are overwhelmingly populated with Afro-Trinidadians. This ethnic group bears disproportionately the brunt of the escalation in violent crime from which the country has suffered in recent years (Townsend 2009).

**Political context**

Most of the independent countries in the English-speaking Caribbean have political systems that are based on the Westminster Model (see Payne 1993; Ghany 1994; Bishop 2011b). This generally entails a parliamentary system of government, from which the government of the day is drawn and in which the leader of the largest party tends to become Prime Minister. T&T is rather unique, though, in that it is one of the few countries that has engaged in constitutional reform over the years to such an extent that its politics are Westminster-esque in content, if not necessarily form. So, it has a non-executive president, whereas most of its neighbours have the British Monarch, represented by a Governor-General, as head of state. Although T&T is a fairly large polity by Caribbean standards, it still suffers from the same kind of “winner takes all” elective dictatorship that characterizes Westminster systems of governance (Ryan 1999, 2001). Although better resourced than many other Caribbean countries, it also suffers from constraints: elected Members of Parliament are often supplemented with appointed Senators, who bring particular expertise to parliament and who even take up ministerial positions when required.

In terms of the contemporary political settlement, T&T is also different to many other countries with significant ethnic divisions. The party political system is highly competitive; ethnic identities as drivers of political choices, while undeniably important, are increasingly less salient than they had been in the past (Bishop 2011a). Since independence in 1962 the People’s National Movement (PNM), which is the party most identified with the country’s early leader, Dr Eric Williams, as well as the Afro-Trinadian population, has generally dominated for long periods of time. However, elections have always been closely fought, particularly in terms of vote share, and, at different points in history (1987-1991, 1995-2001, 2010-present) parties more closely identified with the Indo-Trinadian population have won office and governed.
The current PP government is one such example. However, to simply view this is an Indo-Trinidadian administration would be highly misleading. The UNC, which is the main party in the coalition, is certainly viewed as a largely, but not exclusively, Indo-Trinidadian party. However, the other members—such as the Tobago Organisation of the People (TOP) and the COP—enjoy a wide spectrum of support. Indeed, the COP is a party that is specifically rooted in the country’s flourishing civil society movement and draws its support from the increasingly significant and cosmopolitan, educated, urban middle classes, for whom ethnic politics have lost their salience.

Consequently the coming to power of the PP can only be explained in terms of a broad groundswell against the incumbent PNM and also by the “big tent” nature of its politics. As the data in Table 1 show, throughout the past decade or more, the PNM had consistently enjoyed large majorities in parliament on minority shares of the vote. Yet the PP, by stitching together a broad coalition—in terms of both parties and the wider population—was able to enjoy a landslide victory despite only a relatively small collapse in PNM support as measured by vote share (Bishop 2011a).

A major reason for the PNM’s travails was the escalating levels of violent crime. As discussed in more detail below, the successive PNM administrations of Prime Minister Patrick Manning, which governed continuously between 2002 and 2010, presided over a significant increase in gun-related criminal activity, especially homicides. It would not be an understatement, therefore, to suggest that one of the central issues of concern in T&T’s politics is crime, which has continued to shape public discourse and the parameters of political debate and action.

**Socioeconomic context**

There is no doubt that, in broad terms, T&T is one of the economic success stories of the Caribbean. Underpinned by its extensive hydrocarbon deposits and significant downstream industrial capacity, the country has enjoyed sustained rises in living standards since independence in 1962. It is in many respects a ‘developed’ country and, since 2011, has been classified as such by the OECD.

### Table 1: Recent general elections in T&T (share of vote and seats)

<table>
<thead>
<tr>
<th>Year</th>
<th>PNM</th>
<th>UNC</th>
<th>COP</th>
<th>TOP</th>
</tr>
</thead>
<tbody>
<tr>
<td>2000</td>
<td>46.4% (16)</td>
<td>51.7% (19)</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>2001</td>
<td>46.5% (18)</td>
<td>49.9 (18)</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>2007</td>
<td>45.9% (26)</td>
<td>29.7% (15)</td>
<td>22.6% (0)</td>
<td>-</td>
</tr>
<tr>
<td>2010</td>
<td>39.5% (12)</td>
<td>42.9% (21)</td>
<td>15.1% (6)</td>
<td>2.1% (2)</td>
</tr>
</tbody>
</table>

Source: Psephos Election Archive (http://psephos.adam-carr.net)

### Table 2: Economic snapshot of Trinidad & Tobago

<table>
<thead>
<tr>
<th>Year</th>
<th>GDP (current USD)</th>
<th>GDP per capita (current USD)</th>
<th>Debt-to-GDP ratio</th>
<th>Unemployment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1990</td>
<td>$5.1-billion</td>
<td>$4,171</td>
<td>-</td>
<td>20%</td>
</tr>
<tr>
<td>2000</td>
<td>$8.15-billion</td>
<td>$6,460</td>
<td>54.9%</td>
<td>12.1%</td>
</tr>
<tr>
<td>2005</td>
<td>$15.98-billion</td>
<td>$12,346</td>
<td>36.8%</td>
<td>8%</td>
</tr>
<tr>
<td>2010</td>
<td>$20.59-billion</td>
<td>$15,628</td>
<td>35.5%</td>
<td>5.9%</td>
</tr>
<tr>
<td>2011</td>
<td>$23.59-billion</td>
<td>$17,823</td>
<td>33.44%</td>
<td>5%</td>
</tr>
</tbody>
</table>

Source: IMF Data and Statistics (www.imf.org)
As the data in Table 2 suggest, T&T’s economic performance in the modern era has been striking. After a period of economic crisis in the late 1980s, successive governments have overseen almost uninterrupted expansion. Although not indicated clearly in this table, the country has suffered from inclement economic weather, in particular during the current global crisis in which growth has been stagnant and the government has run consistent deficits. Yet these general problems of economic management tend to be offset—particularly so at the current juncture—by high oil prices, which serve to cushion the public finances even during times of austerity. Moreover, the booms of the late 1990s and early 2000s witnessed significant growth in national income and GDP per capita and concomitant falls in both the country’s debt-to-GDP ratio and unemployment. Indeed, of the independent English-speaking Caribbean countries, T&T has by far the lowest levels of debt, unemployment, and underemployment.

Nonetheless, these figures should also be subject to some degree of scepticism, for a number of reasons. Firstly, T&T has consistently grappled with relatively high levels of inflation: between 2000 (the baseline year) and 2013 the IMF estimates cumulative inflation to be as high as 137 per cent; this necessarily implies that real GDP per capita is not as high as the nominal figure would suggest (IMF 2013). Another issue relates to the broad patterns of social exclusion that exist in the country: data on inequality—as measured by the GINI coefficients—are unavailable, but it is widely perceived that significant levels of inequality exist, particularly between professionals and unskilled workers. A huge proportion of the workforce is employed at minimum wage level—12.50TTD or 1.95USD per hour; these are the people who have borne the brunt of inflation in recent years. Two groups have suffered most. The rural poor, who have seen the collapse of the sugar industry and no real revival of agriculture to replace it, have been marginalized and left without livelihoods in many cases (Richardson & Ngwenya 2913). The urban poor, particularly in areas like Eastern Port of Spain, have few economic opportunities, limited access to state services and utilities, and are surrounded by gang-related criminal activity (Townsend 2009).

Relatively high levels of per capita GDP, then, coexist with pockets of acute poverty and inequality. Sustained growth through industrialization has brought with it environmental degradation and intensified dependence on the oil and gas sector. Organized criminal networks, drugs, guns, and the violence that they bring with them have become increasingly salient (Townsend 2009). These factors together illuminate the complex and contradictory developmental panorama in T&T.

Crime and security

It is critical to understand the historical genesis of crime and insecurity in T&T to grasp how the private security industry has developed in tandem with it. In the immediate post-independence period, T&T was far less stratified economically and socially. Working-class labour tended to be soaked up on the sugar estates and within the oil industry. There was a significant degree of wage equality and the professional classes were comparatively small. During this period the little crime that occurred was generally of a petty character.²

During the 1980s the country experienced a severe economic contraction and a protracted slump. The National Alliance for Reconstruction (NAR) government that acceded to power in 1986 was forced to implement deep austerity. This in turn precipitated severe social agitation, which in 1990 culminated in a coup attempt by the Jamaat al Muslimeen (see La Guerre 1991). This represented a fundamental breaking point for the country and it carried myriad implications for its post-1990 politics and the nature of crime. Politically, the episode destroyed the NAR administration, which suffered heavily in the elections of 1991. In terms of crime, the attempted coup and its attendant State of Emergency led to a new kind of criminal enterprise, including kidnappings, insurrectionary activity, and the beginnings of armed banditry.
By the late 1990s and early 2000s the oil industry had recovered and there was an economic boom. It coincided with the increasing salience of globalization and T&T’s integration into Latin American drug trafficking networks, which manifested itself in drugs and weapons transhipment through southwest Trinidad along routes that had long been used for more benign contraband such as birds and wild meat. With drugs and guns came increasingly powerful and violent local drug gangs. The whole complexity of crime changed.

As Figure 2 illustrates, the rise in violent crime—especially homicides—has been dramatic. Throughout the 2000s the murder rate increased from less than 100 per year to well over 500 by 2008 and 2009. This increase was accompanied by a spike in kidnappings throughout the middle of the decade. This latter trend, which seems to be in decline, has been attributed to a handful of crime families who are no longer active.\(^3\)

From its peak in the late 2000s the homicide rate has recently appeared to drop; in 2011 and 2012 there were 354 and 383 murders respectively. This is a tentatively encouraging sign. However, it should also be noted that between August and November 2011 the government declared a limited State of Emergency, including a curfew, during which time there were far fewer murders (44) than would have usually been expected (Achong 2011).

---

**Figure 1: Murders and kidnappings in T&T, 1999–2012**

[Graph showing趋势图]
As Figure 2 illustrates, theft-based crime has followed a similar pattern since the late 2000s. After a relative peak in 2008 and 2009 it has generally declined into the 2010s, although 2012 did witness a slight increase in these kinds of crimes. Of course, based on this relatively limited time-series, it is hard to draw conclusions about longer-term trends. But, equally, it is the case that there has been a tentative, yet nonetheless discernible, decline in crimes of all kinds in T&T since the relative peak of the late 2000s. It is also the case, though, that the decline in crime in 2011 could be attributed, at least in part, to the State of Emergency, something which is clearly unsustainable as a long-term crime-fighting strategy. Moreover, as discussed below, most experts and industry insiders consulted for this study agree that it is the perception of crime, rather than the actual rate of crime, that is driving the growth in PSCs.

As the data in Table 3 show, the fear of crime in Trinidad and Tobago is striking. For the country as a whole, barely 4 per cent of the people sampled for the 2012 UNDP Citizen Security Survey feel very secure, suggesting that essentially everyone is wary of crime (UNDP 2012a). Indeed, the vast majority of people in every area of the country are either uncertain about their levels of personal security or perceive it to be very insecure, with discernible spikes in some places.

Successive governments have instituted anti-crime strategies with varying degrees of success. There is regular outrage whenever a spate of murders occurs, with often distracting discussion about the merits and de-merits of capital punishment. The reality is that the detection rates for crime, and particularly violent crimes such as murders, is pitifully low—barely 10 per cent in 2013 (Kowlessar 2013). Components of the problem include an underpaid and understaffed Police Service and a lack of progress in adopting cutting-edge methods, particularly in forensics. To gain a handle on the problem, governments have sought external expertise. For example, Commissioner Dwayne Gibbs and his Deputy Jack Ewatski of Canada were hired for two years between 2010 and 2012, but their tenure was dogged by criticism.

It is within this context—characterized by a discernible growth in both violent crime and the perception of it, along with a belief that the protective services are unable to come fully to grips with the problem—that the private security industry has mushroomed.
Table 3: Perceptions of crime in Trinidad & Tobago

<table>
<thead>
<tr>
<th>Police divisions</th>
<th>Q48 In the past year, have you ever felt fearful about the possibility of becoming a victim of crime?</th>
<th>Q53 How secure or insecure do you consider (living in) your country to be?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes</td>
<td>Very secure</td>
</tr>
<tr>
<td>Central</td>
<td>70.8</td>
<td>1</td>
</tr>
<tr>
<td>Eastern</td>
<td>50</td>
<td>4.6</td>
</tr>
<tr>
<td>North Eastern</td>
<td>66.7</td>
<td>3</td>
</tr>
<tr>
<td>Northern</td>
<td>59</td>
<td>2.6</td>
</tr>
<tr>
<td>Port of Spain</td>
<td>64.7</td>
<td>2.4</td>
</tr>
<tr>
<td>South Western</td>
<td>50</td>
<td>3</td>
</tr>
<tr>
<td>Southern</td>
<td>53.6</td>
<td>2.8</td>
</tr>
<tr>
<td>Tobago</td>
<td>33.6</td>
<td>12.6</td>
</tr>
<tr>
<td>Western</td>
<td>73.2</td>
<td>0</td>
</tr>
<tr>
<td>T&amp;T</td>
<td>55.9</td>
<td>3.9</td>
</tr>
</tbody>
</table>

Source: UNDP Citizen Security Survey 2010. Note: All figures are percentages.

The private security industry in T&T: Characteristics and emerging trends

*Definition of key terms and legislation*

The Supplemental Police Act of Trinidad & Tobago Chapter 15:02 (T&T 2011a) is the legislation that currently governs the private security industry, but it is not comprehensive.

*Figure 3: Limited regulation of private security industry in T&T*
As Figure 3 illustrates, only those PSCs and firms that carry precepts are governed by the Supplemental Police Act 15:02. A precepted officer is one who is licensed to carry a firearm. Under the Act, once a precept is granted, the officer becomes part of the country’s Supplemental Police Force, technically placing him or her under the command of the Commissioner of Police.

So, on the one hand, the Commissioner derives the authority to award precepts directly from the Act itself; on the other, by virtue of the granting of the precept, he or she becomes the commanding officer of the resultant supplementary force. In times of crisis the Commissioner can potentially call on all precepted officers to enhance the regular police force. And when precepted private security officers perform an ostensibly public function—such as prisoner transport—on behalf of a PSC, they also enjoy quasi-police status.

The term “Estate Constable” is used to describe precepted officers in the Supplemental Police Act 15:02. It stems directly from the historical period in which private security officers were overwhelmingly watchmen guarding sugar and cocoa estates (see below).

The Estate Police Association (EPA) is the statutory organization that represents precepted officers. It effectively operates as a trade union. Since the mid-2000s its role has been circumscribed to the extent that it only represents precepted officers. The firms that employ them have a statutory duty to negotiate with the EPA on wages, terms and conditions, and so on and to deal with the EPA when it represents officers in disputes with employers.

Consequently the firms themselves are not directly regulated. They apply on their officers’ behalf to the Commissioner of Police for precepts (although it remains the officer him/herself who is precepted) and it is simply by virtue of their precepted officers that they are compelled to register with the Ministry of National Security. Legislation and regulation will be discussed in more detail later, but for now it is worth noting that this legislation is extremely dated. It first came into force in 1906 and has been subject to successive amendments, the most recent in 1993. Because of its age and orientation, it does not offer a definition of a private security company.

As Figure 3 illustrates, the vast majority of both officers and firms are not regulated at all. Because the Supplemental Police Act 15:02 only deals with precepted officers (and, by extension, their firms) there is no legislation—and therefore no legally enshrined governance structures, regulations, or trade unions—that oversee the broader industry. Table 4 illustrates the shape and size of the industry in greater detail.

**Historical genesis of industry**

The industry in T&T has grown in a number of stages. The first PSCs began to be established during the 1970s. This era is widely perceived as that of the “watchman,” when security was essentially conceptualized as the provision of a guard who watched over public buildings and sugar estates. At this time there were only three firms—Brinks, Guardia, and Sentinel—and they enjoyed both a captive market and huge margins. The standard hourly fee charged to clients for a guard was $25 and guards earned only $3-4 per hour.⁵

The industry, therefore, was—and remains—extremely lucrative and the late 1970s and early 1980s consequently witnessed the entrance of many new firms into the market. Some of these charged rates as low as $8-10 per hour (US$1.50–$2.00) with two main effects: first, the market opened up significantly, as the leading firms were undercut and competition intensified; and second, the commodity of private security became accessible to a wide range of potential new clients who had been hitherto unable to afford it.⁶ Underpinning these shifts were the oil price shocks of the 1970s (a boom for T&T) and the greater access that the government had to international finance and loans. These in turn precipitated a boom in public and private construction, with many projects having built-in security stipulations for the protection of plant and property, further contributing to the expansion of the market.

Economic problems and insufficient work caused the collapse of many firms in the latter part of the 1980s. After the attempted coup, the 1990s were something of a watershed, coinciding with two very important developments: a growth in crime, particularly the beginnings of the kind of violent, gun-
related crime against person and property with which we are familiar today; and increased attention from the Ministry of National Security, which began to demand much more from PSCs, many of which were demanding access to firearms to cope with crime trends. Company registration and background checks on directors became necessary, along with greater dialogue between firms and the Ministry.

Only the larger and more organized PSCs could cope with these shifts. These companies had also often provided support to the state during the coup and consequently enjoyed a degree of respect that smaller competitors did not. At this time, barely 25 firms had the required documentation to be registered. Moreover, the post-coup period was one of great introspection by the industry. All firms had suffered and contracted during the crisis years of the late 1980s and the ones that survived consciously recast their operational strategy. Until this point—in tandem with the watchman approach to security—most had essentially tendered for every available contract; this strategy often left them over-burdened with costs, excessive numbers of staff, and unwieldy administrative apparatuses. After the coup, however, the best placed firms all began to rethink their core approach. This took a number of different forms:

- Expansion in size and diversification into a wider range of activities beyond guardsmen, including prisoner transport, access control systems, bodyguards, private investigations, and even supplying the wider industry;
- Assertive upgrading of standards to offer a high-end, niche service to multinational clients, particularly in the oil/gas sector, with specific demands linked to international standards;
- Deliberate contraction in size to focus on labour-intensive markets that require less capital investment (in arms, armoured vans, etc.) and are often low-risk, such as guarding schools, hospitals, and public buildings rather than cash transfer and riskier enterprises.

A number of the more significant firms—Imjin, Innovative, Security Escort Services—reduced in size by up to half to employ around 500 officers; this shift was congruent with the niches they had identified for exploitation. Moreover, 500 seems to be the broadly optimum number of officers required for a firm to be highly competitive. When firms have significantly greater numbers of staff, it is believed that there are significant additional costs in terms of the extra administrative capacity that is needed. Considerably smaller firms find it harder to absorb shocks like staff absenteeism and the consequent loss of a contract, which can rapidly eviscerate cash flow.

As the T&T economy recovered in the late 1990s, the industry began to grow once more. New challenges emerged. Steady increases in crime—and, crucially, perceptions of crime—further increased demand for private security, which was itself increasingly buoyant due to growth in the broader economy. The major problem facing the industry was the attraction and retention of suitable staff (see more below). In the late 1990s T&T’s Unemployment Relief Programme intensified and in 2006 the Community-Based Environmental Protection and Enhancement Programme was introduced; both provide work for often unskilled, un- and under-employed people—and direct competition for staff with PSCs. Given low rates of unemployment in T&T, staffing issues remain a major headache for the industry as a whole today.

**Contemporary overview of industry**

Accurate figures on the size of the industry today are hard to come by. The relative lack of regulation means that only firms that employ precepted officers are obliged to register with the Ministry of National Security.
Table 4: Composition of private security industry in T&T

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Firms registered with Ministry</td>
<td>160</td>
</tr>
<tr>
<td>Firms actively operating with serious capacity (est.)</td>
<td>20–25</td>
</tr>
<tr>
<td>Total number of firms active and inactive</td>
<td></td>
</tr>
<tr>
<td>Low est.</td>
<td>300</td>
</tr>
<tr>
<td>High est.</td>
<td>500</td>
</tr>
<tr>
<td>Number of precepted officers</td>
<td>8,500</td>
</tr>
<tr>
<td>Total number of officers active and inactive</td>
<td></td>
</tr>
<tr>
<td>Low est.</td>
<td>15,000</td>
</tr>
<tr>
<td>Widely accepted mid-range est.</td>
<td>27,000–35,000</td>
</tr>
<tr>
<td>High est.</td>
<td>50,000</td>
</tr>
</tbody>
</table>

Source: Author interviews with key stakeholders

As the data in Table 4 show, grasping the extent of the industry in T&T is difficult. The Ministry keeps records of registered firms and the EPA has a statutory duty to represent the precepted officers who work for them. PSCs are obliged to negotiate terms and conditions of employment with the EPA. Beyond this, though, a considerable degree of hearsay exists: during interviews, all manner of estimates of the shape and size of the industry were ventured. Hence these data should be taken as indicative only.

Nonetheless, we can get a broad sense of the shape of the industry, at least as far as registered firms go. Of the approximately 8,500 precepted officers, the EPA represents around 7,000. Of the 160 registered firms—all of which have at least some precepts—a significant proportion (maybe well over 50 per cent) are currently inactive. It is widely believed that approximately 20-25 firms operate professionally in Trinidad with developed institutional structures and a degree of serious capacity.

Beyond this, the picture is considerably murkier. A huge number of firms operate in the country; some might be quite large but remain invisible because no statutory registration requirements exist for firms without precepts. Moreover, there are an enormous number of fly-by-night companies, which consist of one, two, or a handful of people; are not incorporated; and often engage in the informal provision of security.

Most observers tend to believe that, beyond the core 20-25 firms that undertake the vast majority of security provision, as many as 500 firms operate in the unregulated sector, employing as many as 50,000 officers, on a formal or informal, casual or seasonal basis. None of these officers have the right to representation by the EPA (John-Lall 2011).

**Types of firms, ownership, sectors served, and services offered**

As we have noted throughout the report, because there are no statutory requirements for firms to register with the Ministry of National Security (unless they carry precepts), it is difficult to determine the exact composition of the industry. However, it is evident that the industry continues to grow dramatically and that the vast majority of firms—as many as 500—are very small and often inactive or operating at a largely informal/local level. There are three different types of firms:

- Contract company (PSC for hire by external client)
- Proprietary company (firm, such as Royal Bank, with in-house security)
- Hybrid company (mixture of the two, such as Atlantic LNG, which has an internal security team overseeing security, but contracts out most security functions).
This report mostly focuses on contract companies. For many of the larger firms in the sector, there is a discernible trend toward more technology-intensive security. This is driven by a number of factors. One is the perceived cost of manpower, which for many sites can run into hundreds of dollars per man-hour. Another is the relative decline in cost and increased sophistication of CCTV systems and other security technologies. And these factors are both underpinned by a general desire on the part of clients to cut their security bill and extract greater value from externally provided security—for example, through the deployment of security staff who can add value by taking on other functions (such as secretarial work in an office environment or despatch/clerk functions in a warehouse environment).

Many of the firms interviewed believe that the move to continually cut costs is problematic in general terms. A strongly held view is that, outside of the oil and gas sector in which international standards drive security considerations, many clients see security as something added on rather than fundamentally embedded in their business. And many are increasingly prepared to invest in new kinds of technological security solutions that are initially expensive, but become cheaper over time. Larger firms, such as Innovative, Amalgamated, and G4S, are increasingly responding to these developments, both with the integrated systems that they can supply and by upgrading the human resources required to manage them.

As one manager put it, “we are living through the middle of a significant change in the security paradigm where, instead of only using manpower, firms are opting for greater technology and less, but much more highly skilled, manpower to support it.”

Table 5 details the sectors served by a number of the most prominent security firms in T&T. Some data are missing, either publicly unavailable or not shared during interviews. Nonetheless, the information clearly highlights the wide range of sectors served by PSCs in T&T and the relative size and composition of some. Amalgamated is widely regarded as the largest firm with the most extensive level of provision. G4S is the only genuinely global company. The remainder of the serious companies in T&T tend to be a similar size—a few hundred to about 500 officers—and all are focused on specific niches.

**Table 5: Characteristics of select PSCs and sectors served**

<table>
<thead>
<tr>
<th>Ownership and reach</th>
<th>G4S</th>
<th>Amalgamated</th>
<th>SWAT</th>
<th>Imjin</th>
<th>Security Escort Services</th>
<th>Intercept</th>
<th>Pegasus</th>
<th>Innovative Security Technologies Ltd</th>
<th>SESL Ltd</th>
<th>First Guards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Staff size</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Government</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Financial</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Embassies</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Private individuals</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Retail</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Oil and gas</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Ports/airports</td>
<td>✓</td>
<td></td>
<td></td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

Source: Websites of firms and stakeholder interviews
The data in Table 6 illustrate the wide range of services offered by some of the most prominent firms in T&T. In most cases, they tend to offer a number of different services that are congruent with their specific niches. Amalgamated is the only firm that really tries to offer across-the-board security provision, and it is widely recognized as the firm that provides the most services to the industry itself.

Some other interesting patterns can be discerned, too. Most of the mid-size firms tend to leave the most dangerous work, such as cash transfer, to larger companies such as G4S and Amalgamated, which have the infrastructure—such as secure vans—required to undertake it properly. Moreover, increasing numbers of companies are beginning to engage in more technologically orientated work.

Only two firms in T&T offer extensive security provision to the most sensitive parts of the country’s energy infrastructure at Point Fortin and Point Lisas: Innovative Security and Security Escort Services Ltd. Because of the demands of international maritime regulations, these firms are, at present, the only two accredited to the standard of the International Ship and Port Facility Security Code (ISPS). Moreover, only Innovative currently has the Safe TO Work (STOW) accreditation, which is a higher level of health and safety accreditation that all contractors working in the energy sector are obliged to have (STOW 2012).

Table 6: Select PSCs: Services offered/accreditation

<table>
<thead>
<tr>
<th>Service</th>
<th>G4S</th>
<th>Amalgamated</th>
<th>SWAT</th>
<th>Imjin</th>
<th>Security Escort Services</th>
<th>Intercept</th>
<th>Pegasus</th>
<th>Innovative Security</th>
<th>SESL Ltd</th>
<th>First Guards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guards (unarmed)</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Guards (armed)</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Armed escort/ cash transfer</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>K9</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Vehicle patrol</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Alarms/CCTV</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>ICT/network security</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Investigative</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Rapid response</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Prisoner transfer</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Security training/ consultancy</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>STOW accreditation</td>
<td></td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>ISPS accreditation</td>
<td></td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

Source: Websites of firms and stakeholder interviews
**Employment trends**

The minimum wage in T&T currently stands at $12.50 per hour (US$1.95) and has been at this level since 2010, when it was increased from $9 per hour. At the lowest rungs of the industry, most security guards earn the minimum wage, although in the more established, professional firms wages can be up to 35 per cent higher—between $15–$20 per hour—due to the need to attract higher quality staff and retain them. For more highly qualified officers, such as precepted officers who are licensed to carry firearms, the wage rates can be as high as $30–35 per hour; supervisors' salaries can be as high as $10,000 per month. Moreover, firms with specific security needs—notably those with significant in-house security operations or the major oil and gas firms—will pay even higher wages for security staff with specific skills.

The challenge of meeting employment demands has a number of dimensions.

First, low unemployment in T&T means that there is a limited pool of staff available; and as many as 50 per cent of those seeking work are disbarred from working as security officers because of minor drug convictions, illiteracy, and so on. In response to these conditions, the larger firms offer free uniforms, free transport to and from work, higher wages, training and a wider range of career options/progression, and, increasingly, benefits such as healthcare and pensions. However, higher costs can serve to erode the competitiveness of these larger firms vis-à-vis smaller firms, many of which are essentially invisible.

Second and perhaps more important is the significant conflict between the EPA and the major PSCs over employment conditions and wages. The Minimum Wages Order of 2010 (T&T 2010) stipulated a normal working day of eight hours, after which staff would be entitled to extra paid breaks and, for another four hours of work, payment at 1.5 times the hourly rate. However, because the normal working day for security officers has long been 12 hours, the industry has claimed an opt-out on the basis of the Minimum Wages Order of 1995 (T&T 1995). A number of distinct elements require disentangling:

- The larger firms in the industry not only contest the legitimacy of the claim for overtime in the industrial court, but state that, if forced to implement overtime pay, they will simply move staff to an 8-hour workday schedule, which they claim the workers are against.
- At the same time, many larger firms see low pay as a serious problem that they are somewhat powerless to resolve, given that a) they often already pay higher rates for higher qualified staff; b) any increase in pay for lower-level staff would seriously erode their competitive edge over smaller firms, many of which have lower costs by cutting corners on taxes, insurance, uniforms, staff benefits, and so on; and c) clients—especially outside critical sectors such as oil and gas where specific demands are made—refuse to pay more than the acceptable minimum for security, which many see as a box-checking exercise for insurance purposes rather than an integral and essential service.
- While the EPA has continued to argue that firms should be compelled to pay overtime, it only represents precepted officers, not the many more un-precepted officers.
- The officers are in an invidious position. Those who are not represented by the EPA (the vast majority, including the unskilled at the bottom of the private security food-chain) can ill afford to alienate their bosses and they are understandably reticent about shifting to an 8-hour workday and losing a third of already extremely low wages.

The third challenge is the general pattern of exploitation that prevails in much of the industry. (Again, we can exclude the more professional, established firms that, as noted, tend to treat their staff reasonably well.) The horrific examples ventured during interviews with industry insiders include:

- Charges for uniforms and other necessary work paraphernalia;
- Not being paid, being paid below minimum wage, or not being paid agreed amounts;
- Summary fines of one or two days’ wages with no due process for alleged indiscretions;¹⁴
- Forced overtime that sometimes compelled officers to work 24, 48, and even 72 hours straight and to undertake excessive overtime with no breaks or hot meals.¹⁵
While these problems are extremely worrying in themselves, they also have knock-on effects. Officers who work long hours in often appalling conditions, with high insecurity and vulnerability, suffer from a lack of wellbeing. Armed officers staffing a post for lengthy periods might perceive threats differently.16 Certainly there are social consequences in having poorly paid, stressed people working long hours in poor and dangerous conditions.

The fourth employment challenge relates to the gendered consequences of private security. With no accurate figures, it is believed that, at least in the larger and more professional firms, approximately 40–50 per cent of employees are women.17 Four of the firms interviewed indicated that 35 per cent, 40 per cent, 46 per cent and 50 per cent of their employees were women. Large numbers of female employees are hired in T&T for a range of reasons. As noted, there is a significant shortage of unemployed men, partly because of the strength of the T&T economy. Second, women often better satisfy the basic entry requirements than do the unskilled men. Third, women without husbands or fathers for their children are often compelled to enter the industry as it provides a regular—and often quite flexible—source of income.

Most firms do not in general discriminate between women and men in the work they undertake. The larger companies do tend to make some concessions to gender: they have sanitary facilities in place and women working at night are placed in secure office facilities, often with mixed groups of colleagues. Some firms even consciously hire women and tender for contracts to guard schools and other low-risk facilities, training their female staff in conflict resolution techniques and so on.18 In these firms women have the same opportunities for promotion and advancement as men; increasingly, they are precepted, although they tend not to be given notably dangerous duties such as cash transfer. By contrast, many of the smaller and more invisible firms have little regard for gender issues, sometimes placing women “in the boondocks late at night,” as one observer put it.19

The final piece of the employment puzzle concerns the strategies that firms employ to labour shortages. Many offer the kinds of positive incentives noted. However, it is widely perceived that many firms employ undocumented migrants as security guards; these workers can be open to additional exploitation.

So the employment picture is extremely mixed. Private security is a relatively dangerous industry that employs between 15,000 and 50,000, with a relatively small proportion enjoying any kind of statutory representation. Wages are generally quite low; working conditions for the majority are believed to be poor—and sometimes appalling and exploitative; and, as discussed below, regulation is lacking. Moreover, as was often noted during the research, suspicion is widespread that one reason that the government has consistently failed to regulate the industry is because it soaks up so much excess labour and tougher regulation could jeopardize this result.20 If tougher regulations and employment rights were aggressively enforced, it is believed that a significant number of firms would go under. Moreover, stringent standards for officers themselves—such as the need to pass a qualifying exam, currently required only for precepted officers—would further reduce the already limited pool of available staff.

**Inter-industry and agency linkages/relationships**

Relations among the major firms are generally cordial. With generally enough work to go around, most major firms recognize and respect each other’s professionalism and strengths. As one company owner said, “We are competitors, not enemies.”21 Over the years, a number of initiatives have been taken to institutionalize co-operation; the main two organisations are the Association of Security Companies of Trinidad & Tobago (ASCOTT) and the rather more exclusive Security Owners and Managers Associates of Trinidad & Tobago (SOMATT). Under the leadership of Mr. Ibn de Leon (Strategic Asset Solution) and Mr. John Aboud (Amalgamated) SOMATT has been extremely active in pushing the need for regulation, devising the necessary legislation, and seeking to elevate and improve industry standards across the board.22

In contrast ASCOTT does not provide a forum for the systematic institutionalization of industrywide co-operation. It only comes alive when serious problems need to be resolved or when a crisis requires a decision-making body. It is rather ad hoc and issue-based, often not following through on decisions.
ASCOTT’s main concerns lately have been the ongoing wrangling over wages and overtime, and industry regulation.

The newly created Private Security Network Commission (PSNC) brings together the most stakeholders. Launched in 2010 by Brigadier John Sandy, then Minister of National Security, it has 12 seats for representatives from the Ministry of National Security, the T&T Police Service (TTPS), the private security industry (both contract and proprietary providers of security), the local telecommunications industry, and an academic institution providing criminal justice/security courses (Sandy 2010). Observers involved with PSNC suggested that its broader remit should encompass some or all of the following:

- The sharing of information among all key strategic security actors on crime and criminals, and the development of systems to further expand and institutionalize information-sharing;
- Improving the relationship between public and private security providers, and developing the potential and capacity of PSCs to contribute to the provision of security more broadly;
- The creation of umbrella institutions to synergize the activities of different supplemental police units and the wider security apparatus.\(^{25}\)

However, the PSNC has been slow in getting off the ground. In April 2013 members finally received their instruments of appointment, shortly before Minister of National Security Jack Warner left office. At the time of writing it was not clear how the change in minister will influence the institutionalization and development of the Commission.\(^{24}\) Nonetheless, most industry observers see the Commission as a good idea, particularly in bringing together PSCs and the TTPS to try to fix what is sometimes considered a “disjointed” relationship.\(^{25}\)

The working relationship between the TTPS and the Trinidad and Tobago Defence Force (TTDF) is generally solid, with good relations at senior levels. The two increasingly work together. The TTDF, with an extensive capacity in planning and operations, has helped to develop this capacity in the police.

However, the relationship between the PSCs and the public forces, especially the police, is more uncertain. At senior levels, collaboration is increasing as the potential of mutually supportive roles is realized. For example, PSCs have increasing levels of technical expertise, which the police do not always have. And PSCs provide a training ground for the police, since many officers see working in a PSC as a steppingstone to a career in the police service; PSC owners and managers often lament that they lose their best staff to the police. But at lower levels significant conflict between private security officers and the police exists; the latter are often antagonistic to the former and tend not to respect their role and function.\(^{26}\)

**Industry trends and challenges**

As described, today there is enormous demand for private security. With T&T’s economy expanding and crime more troubling, almost every firm, organization, and public institution requires some kind of security. This general pattern contains a number of notable specific trends:

- PSCs offer a growing range of services. Non-traditional kinds of security provision include emergency medical services, prisoner transport, GPS tracking, marine patrols, aviation security, rapid response, alarms and CCTV, ICT and network security, neighbourhood patrols, executive bodyguard services, private investigations, and secure delivery of persons (e.g., flight attendants, expatriate oil and gas staff, etc.).
- Demand has increased for both training and academic study of the industry and security more broadly; this demand is not being satisfied at present.\(^{27}\)
- Demand has grown for more highly skilled officers. In the past officers were generally retired soldiers or police; now firms want to hire people with advanced technical training and skills.
- Although individual ownership remains dominant, a tentative trend toward the institutionalization of corporate structures can be seen. Their size means that some firms will inevitably become more corporate in character, particularly as the industry begins to see more mergers, acquisitions, and consolidation.\(^{28}\)
The principal drivers of change (some already discussed in some detail) are generally perceived to be:

- Significant increases in crime and the fear of crime;
- The enormous growth of both public and commercial property and infrastructure;
- Increased innovation within—and diversity of—the industry itself and a more sophisticated and wider range of services on offer;
- Higher standards of international actors, especially ports through the ISPS;
- The profitability of an increasingly lucrative industry, leading to significant increases in investment;
- Greater demand in the wake of domestic/international problems/shocks.

The major challenges faced by the industry (some already discussed) are:

- Lack of professionalism and standards in the unregulated parts of the industry, including violation of employment legislation and exploitation of staff;
- The broad nexus of employment problems, which, from the perspective of PSCs, are manifested in an acute shortage of quality labour, which has driven the recruitment of unregulated migrants, both from outside the Caribbean (often Africa) and from the wider region;\(^\text{29}\)
- Lack of regulation of PSC employees, the firms, the owners and executives, and the wider industry;
- Lack of public understanding of the role and function of private security officers and companies;
- Limited relations with law enforcement;
- At present PSCs tend to provide services (e.g., prisoner transportation) more cheaply than state bodies could, but insufficient attention has been paid to developing an overarching framework that lays out the optimal balance between public and private security to achieve maximum synergy;
- Problems surrounding use of arms and other weapons (see below).

Overview of current legislation, regulation, and practice

As discussed, the legislation that governs the industry in T&T is extremely dated and considered by many observers essentially “archaic.”\(^\text{30}\) The main legislation governing precepted officers is the Supplemental Police Act 15:02 of 1906, which was most recently amended in 1993 (T&T 1993). Since the 1990s five separate bills have been prepared to regulate the industry, all of which have fallen by the wayside. The regulation that came closest to being realized was the Supplemental Police Amendment Bill of 2001 (T&T 2001), which was not a particularly radical document. It was mainly intended to further revise the earlier act, including new provisions that permitted the EPA to represent non-precepted officers and so on. Yet this bill lapsed when parliament was dissolved in 2001 upon the collapse of the UNC government of Basdeo Panday. As noted, the Ministry of National Security is believed to be quite close to bringing new legislation before parliament.\(^\text{31}\) The main components of the proposed legislation are as follows:

- An amendment to the Supplemental Police Act will occur in tandem with the new Private Security Act and separate the role of an Estate Constable from that of a private security officer. Trinidad & Tobago is unusual in that a precepted security officer is also technically a supplemental police officer. This will end: armed officers working for PSCs will be able to access firearms licences, but they will no longer become supplemental police officers. Officers working for proprietary providers of security such as banks or quasi-state entities such as Petrotrin will still be precepted as Estate Constables. The role of an Estate Constable under the Supplemental Police Act will be reformulated to exclude private security officers.
- The EPA will have the right to represent both Estate Constables and private security officers, armed or unarmed, but will no longer have a statutory monopoly. Security officers will not be obliged to join the EPA, but will be free to set up their own associations or unions.
- A regulatory body similar to that in Jamaica will be created, with responsibility for the maintenance of industry standards.
- A sectoral minimum wage for the private security industry higher than the national minimum wage will be recommended. This new rate will go some way in solving the most destructive aspects of price competition, which prevent PSCs from paying higher hourly wages to officers.

At the time of writing the legislation had still not come before parliament. The failure of the state to regulate the industry—until now, perhaps—has several causes, according to observers:
• A simple lack of political will and generalized inertia, along with the perception that regulation is not a strategic priority, either for the Ministry or the government;
• The recognition that tighter regulation will create a number of new problems, including the marginalization of many weaker firms and a concomitant increase in unemployment;
• The perception that implementation of any regulation will be difficult, take much administrative time and many resources, require the development of new and costly infrastructure, and will be expensive to police properly;
• The implausibility of some aspects of the proposed legislation, which draws on examples of legislation from developed countries such as the United Kingdom rather than legislation that works in the Caribbean, as in Jamaica, and would be difficult to operationalize in T&T, with different literacy rates and supporting infrastructure.

Some industry insiders and observers are worried that there has not been enough consultation with the industry, especially smaller firms, in developing the legislation. Even the bigger players are concerned that they might be blindsided when the legislation is published. Some of the desired reforms are detailed below; many are controversial, whereas others enjoy a degree of consensus:

• A significant increase in statutory training for all private security officers, along with detailed background checks and licensing for precepted and un-precepted officers, should take place independently of firms and even within a national Academy for the Security Industry that combines academic and practical training;
• A level playing field for firms in terms of firm registration requirements, insurance, provision of uniforms and other equipment, taxation, national insurance contributions, etc., with the broader requirement that all firms must be licensed and managers/owners should be subject to mandatory training and licensing requirements;
• Clear regulations on working hours, overtime, minimum wages, pensions, health coverage, insurance, and workers’ rights more broadly, including statutory monitoring and an open and transparent grievance procedure with severe penalties for exploitative firms;
• The creation of a standing committee with the statutory right and responsibility to monitor, evaluate, and investigate licensed firms and officers;
• Greater recognition of the wide variety of tasks undertaken by private security officers, along with the development of much more extensive provision for training and long-term skills development;
• A re-envisioning and clarification of the relationship between public law enforcement and PSCs, the creation of a more active role for private security in broader security policymaking, and the creation of positive synergies so that PSCs can become a “force multiplier” and the police service can increasingly focus on the most serious crimes and investigations;
• The elaboration of more effective systems and architectures for the systematic sharing of information —licensing of firms could include a conditional remit to share information with police and the wider security community;
• A mandatory insurance scheme in which firms make a deposit with the industry to cover failure of the firm and other negative eventualities; if this idea is extended, firms could pay a regular due to fund the establishment of training programs and the Security Academy.

Broadly speaking, the industry is somewhat optimistic that regulation is finally imminent. In any case most of the larger firms (especially international firms such as G4S, regional ones such as Amalgamated, and those that service the globally linked energy sectors) have already institutionalized very high standards, many of which are based on existing international regulations.

Treatment of firearms

Research is difficult to do on the ways in which firearms are used. Industry stakeholders are often cagey about discussing the challenges faced with guns. Almost all serious security companies in T&T have some precepted officers, but they tend not to use all precepts at once. In most major firms approximately 50 per cent of the serving officers are precepted, but only about half (or fewer) of them are operating at any one time. It is believed that approximately 3,000 of the 8,500 precepted officers in T&T are working and armed on a daily basis. Some firms are consciously trying to reduce the number of precepts and weapons that they require, because of the problems created by a large cache.
The major problems faced with firearms are:

- Many firms have weak protocol and procedures for storing, monitoring, and verifying firearms and do not have the capacity or infrastructure—strong boxes and so on—for their safe keeping. Some lodge weapons at a police station for a fee, but this solution is not adopted universally.
- Weapons are not always transported properly or safely. Smaller cash transport firms often have only one armed officer, who must carry bags of cash as well as a firearm. Some smaller firms even use common panel vans to collect cash, so that guards might have bags of money by their feet inside the van, rather than securely locked away.
- Armed officers are often targeted by bandits, robbed, and even killed. PSC buildings are sometimes targeted and burglarized, with sizeable weapons caches and ammunition taken. Sometimes the theft is not noticed for a significant period of time.
- With certain exceptions, almost anyone can be precepted after limited training and licensing.
- Precepted officers do not always have sufficient training to determine the relative danger of different situations. Many firms do not provide ongoing training, calibration of weapons, systematic range practice etc., yet precepts are still renewed.
- There have been claims that, when some firms are short of staff, they provide an un-precepted officer with an unloaded gun so that s/he appears to be armed.
- The Office of Law Enforcement Policy (OLEP) in the Ministry of National Security, the agency charged with oversight of the industry and the development of regulation, does not, at present, have the power or resources to systematically monitor arms caches. The police are mandated to monitor weapons stores, but do not always have the resources to carry out this task systematically.
- In the past, procedures to apply for a precept took 18-24 months and would involve auditing accounts and significant background checks. Today the process takes a few months, leading to suspicions that checks are insufficiently thorough.
- PSCs increase the prevalence of weapons in a country, creating an arms race with criminal gangs.
- These increases in weapons are based as much on perceptions of need by PSCs as they are on decisions made by public officials that are based on a holistic assessment of public safety.
• These decisions are essentially invested in the Commissioner of Police, which has led to a heated debate. Some see as archaic the investment in one person of such a contentious decision-making process. With fewer checks and balances in place, decisions taken by the Commissioner might be driven by subjective opinion and political concerns rather than a balanced strategic needs assessment. Others see a board as potentially even more corruptible or open to political pressure than a well-insulated Commissioner, particularly if some members have a vested interest in the industry. A Commissioner can chart a clear course regarding weapons policy and, more than anyone else, has a vested interest in ensuring that the fewest weapons possible are in circulation and that precepts are awarded in a controlled fashion.

• Beyond these challenges are examples of good firearms practice in the industry. They include:
  - Advanced and continuing training for precepted officers provided by firms, including regular range practice, threat perception training, risk mitigation, shooting under stress, and so on;
  - Well-developed codes of firearms usage based, for example, on the Voluntary Principles on Security and Human Rights (U.S. & U.K. 2000) and the International Code of Conduct for Private Security Service Providers (Switzerland 2010), which demand on-going training, updating, and practice;
  - Advanced systems of “custody and control” for weapons that require twice-daily reports to the Operations Manager of the location of all weapons, real-time monitoring of defective weapons, and the logging and storing of all weapons at the end of every shift, with no officers permitted to take weapons home.
  - Clear procedures for weapons disposal (via the TTPS).

Conclusions and recommendations

This study has sought to offer a broad overview of the state of the private security industry in T&T. It has mainly focused on contract, rather than proprietary companies. It has emphasized how the nature of the regulatory context—characterized by extremely dated legislation and a largely unregulated sector beyond the major firms which carry precepted officers—makes it difficult to create a clear picture of the industry as a whole. Nonetheless, some relatively clear conclusions have emerged from the study. They should, of course, be read in conjunction with the conclusions from the counterpart studies on St. Lucia and Jamaica.

Conclusions

Conclusion #1
Legislation to regulate the private security is long overdue. The current historical juncture is critical as legislation is well-developed, with a variety of key stakeholders on board, and the People’s Partnership administration is at the midway point of its term. If the government does not soon push through legislation, it could fall by the wayside once more.

Conclusion #2
Any legislation that emerges must account for a wide range of thorny issues that include employment, wages, staff conditions, and gender issues; the regulation of a vast number of often tiny firms well beyond the major players; use and abuse of firearms; mandatory training and licensing of officers, firms, and executives; the relationship between the PSCs and public security services; and the rapidly changing panorama of security provision and consumption in the country (and region).

Conclusion #3
Any regulation has to overcome a range of challenges, including effective implementation and the creation of an expensive monitoring infrastructure, as well as balancing with sensitivity the continued and widespread need for security with the ability of smaller firms to provide it (and less well-off customers to pay for it) in a context of raised standards, tighter regulation, and higher costs.
Conclusion #4
The shortage of suitable labour is the main challenge for the industry at present. A number of factors mitigate against a solution in the near future, including the lack of a resolution with the EPA over wages; the soaking up of the un- and under-employed by government make-work programs; the inability to extract higher man-hour rates from clients; and the lack of government agreement on imported labour—for example, by opening the private security labour market up to unskilled CARICOM nationals.

Conclusion #5
Much more thought needs to be given to the shifting national and regional context in which the private security industry operates. Most Caribbean governments are under severe fiscal pressure, with little sign that the end to the crisis is in sight. The kind of broader security sector reform that is proposed is impressive on paper, but institutionally weak. Governments will increasingly have to outsource their security functions to a growing private security sector, which is often more effective than state security providers—especially the police—and more sophisticated in dealing with newer challenges, such as investigating white collar crime, technologically intensive security provision, guarding airport and sensitive infrastructure, and so on.

Over time such outsourcing will have an impact on standards, costs, and procurement. It is quite conceivable that PSCs will become considerably more advanced than their public equivalents, in a context in which new challenges—cybercrime, terrorist financing, money laundering—are increasingly salient. There is very little strategic thinking taking place at the state level about the new types of PSC provision; legislation does not take this into account. Police across the region plan almost exclusively at the tactical, rather than strategic—or even operational—level.

Future trends

Trend #1
Technology will take on a far greater role, offering the potential to simultaneously overcome the problem of limited labour while up-skilling many of those working in the industry. Skill development will bring improvements in working conditions, wages, and benefits. Initiatives will include much more electronic monitoring, surveillance and centralized reporting; more effective tracking through GPS; and increased access to localized technology solutions for customers through smartphone applications.

Trend #2
The industry is likely to keep growing in size and reach, as demand continues to grow. Industry observers expect the public security forces (i.e., the TTPS and TTDF) to procure more services from PSCs, particularly at the higher end, given the levels of innovation that are taking place in the industry.

Trend #3
Attempts to create a networked connection between public and private security (beginning with the PSNC) will continue, blurring the boundaries between the two.

Trend #4
Far more research and training will be on offer, either by a state-sanctioned Academy with a defined statutory role or private providers responding to industry needs and demands.

Trend #5
Regulation is seen by most as essentially inevitable. Even if does not arrive, standards will be driven up because the leaders in the industry in terms of health and safety, employment practices, firearms procedures, and so on continue to benchmark themselves against increasingly stringent international standards. Although costlier than some of their competition, they will increasingly receive more lucrative contracts, particularly in sensitive sectors, and they will attract the best staff.

Trend #6
Significant mergers and acquisitions are in the industry’s future. Firms will seek to acquire specialist skills and compete in growth sectors. When regulation arrives, smaller companies that are unable to meet the required standards will be absorbed. Even in the absence of formal takeovers, it is expected that
other modes of co-operation, such as joint tenders, will become increasingly prevalent, particularly for larger and more complex contracts that require a range of security services and large numbers of staff with varying skills at a given location.

Recommendations

Recommendation #1
The Ministry of National Security should immediately bring forward the legislation required to regulate the industry and mandate a review panel to monitor its implementation and suggest future amendments as its implications become clear.

Recommendation #2
Special attention should be paid to employment issues, including the introduction of a sectoral minimum wage. The EPA, or a similarly mandated organization, should have the statutory right to represent all officers, whether precepted or not. Robust channels should be constructed so that officers have recourse for the protection of their wages, terms, conditions, and rights.

Recommendation #3
Beyond the various firearms acts, regulation of the industry should lay down clear guidelines on monitoring, management, and infrastructure for firearms, based on best practice in the industry. Enforcement should be stringent. At present, the T&T Police Service undertakes issuing, vetting, and monitoring; these three roles could be separated. Vetting, in particular, could be taken over by an independent body, as the TTPS do not have the resources to engage in a proactive auditing process.

Recommendation #4
Regulation should include the licensing of all officers, precepted or not. Provision should be made for the licensing of PSCs and their executives, including a specific training requirement for managers and owners of firms.

Recommendation #5
Mandated training programs should be created. A private security academy with statutory underpinning might also be started; it could link the public and private security institutions, as well as academia, government, and other interested actors.

Recommendation #6
An umbrella institution should be formed to bring together public security agencies and PSCs to achieve greater co-ordination of activity, training governance, information sharing, synergies, etc.
Interviewees

Curtis Belford, OLEP
Pete Carrington, Innovative Security
Major General Edmund Dillon, Atlantic LNG
Kenneth Green, G4S
Callixtus Joseph, CARICOM-IMPACS
Imsha Mohammed, Imjin Security Services
Edison Munroe, Estate Police Association (EPA)
Brian Ramsey, Amalgamated Security
Keith Renaud, OLEP
Derek Smith, Security Escort Services Ltd.
Anthony Xavier, Property Protectors Ltd.
Notes

1. For more on the coming together of these two parties, see Bishop 2011a.

2. Confidential interviews with key stakeholders.

3. Confidential interviews with industry stakeholders.

4. Confidential interview with industry insider.

5. Confidential interview with PSC owner. NB: US$1 = TT$6.4 today.

6. Ibid.

7. Ibid.

8. Confidential interviews with PSC owners and managers.

9. Confidential interview with PSC owner.

10. This concept was used endlessly in interviews to describe firms. There is a real sense that the industry beyond the larger, more serious firms is enormous, growing, and essentially a 'Wild West' (another term that was used more than once) frontier.

11. Confidential interview with PSC manager.

12. It should be noted that, even in the context of a developing country, this is an extremely low minimum wage. Cumulative inflation between 2010 and 2013 (during which time the minimum wage has not increased) has been approximately 30 per cent, so that the gains of the 2010 increase have already been wiped out for the lowest paid. If we consider that, on the basis of a 12-hour day and 6-day week—a common schedule for many security guards—the salary would be approximately $3,600 monthly or $43,200 annually. This is barely a third of T&T’s average GDP per capita and a strong indication that income inequality in the country is acute.

13. Confidential interviews with PSC owners and managers.

14. One observer noted that fines are actually illegal. Under a provision of the Supplemental Police Act a fine of $5 can be levied if properly constituted and paid to the Consolidated Fund. Many staff members, with no obvious recourse, receive paycheques with significant amounts of money summarily deducted.

15. The different Minimum Wages Orders clearly stipulate that a security guard cannot be forced to work for more than 16 hours continuously in any 24-hour period. Set schedules of breaks must be observed when overtime is undertaken. One observer noted that firms bring the dogs food and water, but the officers nothing.

16. One interviewee noted that in the protective services—police and army—no officer would staff a post for more than four hours, because of the levels of concentration required, resulting in stress on the officer and the potential for dangerous accidents.

17. Confidential interviews with PSC owners and managers.

18. Confidential interviews with PSC owners and managers.

19. Confidential interview with PSC manager. We should note that it is unclear whether these proportions hold true for the industry as a whole. Because the vast majority of firms are small and unregulated it is difficult to ascertain without more systematic research whether they employ significant numbers of women.
20. Confidential interviews with PSC owners, managers, and industry observers.

21. Confidential interview with PSC owner.

22. Confidential interviews with industry stakeholders.

23. At present the various supplemental police units (that comprise the 8,500 precepted private security officers) are officially under the command of the Commissioner of Police by statute. Some observers see many efficiencies if greater co-ordination is undertaken at the centre.

24. Confidential interviews with industry stakeholders.

25. Confidential interview with PSC owner.

26. Confidential interviews with PSC owners and managers.

27. It should be noted that the University of Trinidad & Tobago (UTT) has been in the process of establishing a variety of training programs, both academic and practical, to service the industry. It is expected that these will come fully online and become increasingly important if and when broader regulation of the industry comes into force.

28. Almost every PSC owner interviewed indicated that, as regulation comes on stream, significant industry consolidation will leave only a handful of firms—or alliances—among the larger players.

29. There is no provision in the Caribbean Single Market and Economy.

30. This term was used consistently in interviews with respondents.


32. Confidential interview with PSC manager.

33. As noted previously, there have been some moves made toward this at UTT, but it is still some way from being an institutionalized reality. The idea behind licensing officers independently of the firms is that they should become licensed before they enter the industry, and can then take up employment with any firm (with the licence removing much of the regulatory burden from the firms). Existing officers could be given a grace period to acquire the necessary training. One downside relates to whether some people could be squeezed out of the industry. As one PSC owner noted, not all tasks require a high level of skill and training; many good officers would never be able to meet higher literacy or numeracy requirements.

34. Confidential interview with industry stakeholders.

35. Confidential interviews with PSC owners and managers.

36. Confidential interviews with PSC owners and managers.

37. This does not necessarily imply any kind of corruption or the favouring of certain industry interests. A number of stakeholders noted how, during his tenure, Commissioner Gibbs was instinctively reticent about approving precepts because of a general aversion to the growth of weapons. During this period, companies had to cope with fewer precepts, compromising, as they saw it, their ability to do their jobs properly.

38. In the late 2000s an appeals board was established so that firms and individuals denied a precept can appeal the decision.
39. There are only two VP-certified trainers in T&T. It is an expensive and demanding standard to follow and only a handful of firms in the country have adopted it.

40. A number of key industry observers made this point at the stakeholder workshop.
References


Bishop, M.L. 2011a. Coalescing for change? Novel coalitions in the UK and Trinidad and Tobago. The Round Table 100 (412), pp. 55-63.


Private Security Companies in Jamaica
Kenneth Epps

Research Goal and Objectives

The goal of this case study research was to understand the role and impact of private security companies (PSCs) in Jamaica so that policies could be developed on the regulation and oversight of PSCs to enhance public sector and private security partnerships and cooperation, improve security, and reduce armed violence.

The case study objectives were:

• To understand the forces that have shaped the PSC industry’s development in Jamaica;
• To map out current PSC operations;
• To analyze the existing legislative and regulatory framework in Jamaica;
• To review and assess the consequences for security of PSC industry regulations and operations, including the use of firearms; and,
• To make recommendations on the regulation and oversight of the PSC industry and the development of public sector and private security partnerships and cooperation.

Methodology

The case study method (Yin 2009) was the primary research method used, supplemented with a survey of private security companies and government agencies responsible for their regulation. Key elements of the methodology were:

• A contextual analysis of academic and policy literature on private security in Jamaica to ascertain, in broad terms, how the industry has developed in recent years.
• Secondary material from the (relatively limited) academic literature as well as newspaper articles; telephone directories; technical reports; and government documents, legislation, and regulations to provide the background contextual detail on the development, operation, and growth of private security in Jamaica, as well as the main governance responses to it. The telephone directories provided PSC contact information as well as information on the nature and number of company services on offer. The directory listings identified some companies not registered with the Private Security Regulation Authority (PSRA).
• Where possible, one-on-one elite interviews with actors involved in the private security industry.
• Elite interviews with political actors with a vested interest in the industry; in particular, officials of the Private Security Regulation Authority, the Firearm Licensing Authority, the Jamaica Constabulary Force (JCF), and the Jamaica Defence Force (JDF), as well as academics and other experts.
• Survey questionnaires administered to a small number of PSCs that reflected the heterogeneity of PSCs in the country.
• The last three above provided new data to allow a detailed examination of PSCs in Jamaica. Interviews addressed questions relating to the establishment and ownership of the industry; services provided, purpose, and capacity; personnel, training, and professionalism; control of firearms and other weaponry; existing, proposed, and desired regulatory changes; and relationships with other actors and key stakeholders.
• The number of completed survey questionnaires was fewer than anticipated. Industry representatives seemed hesitant to provide company data and operative detail. At the time of the fieldwork contact information was available for 206 companies, including companies not registered with the PSRA. Fifty-two companies were contacted individually by telephone or e-mail to request participation in the survey. Of these, 38 companies agreed to participate and were provided with a survey questionnaire. During followup visits and contacts, representatives of several companies declined to complete the questionnaires. Despite repeated contact with the remainder, during which several representatives indicated that they would likely complete the questionnaire, by (the extended) field study deadline
only 11 survey questionnaires had been completed. Of these, 10 were from contract security organizations (see PSC definitions below) and one was from a proprietary security organization. All but two of the organizations were registered with the PSRA with a valid licence in March 2013 (see Appendix 1). The number of employees in the 10 contract security organizations ranged from more than 1,000 to less than 25.

- The majority of industry representatives who completed surveys requested that the name of their company be excluded from the information disclosed by the surveys. As a result, the case study discussion and analysis are not attributed to identified companies or spokespeople unless the information has been made public elsewhere.

**The origin and development of the industry**

**INDUSTRY ORIGINS**

Armed violence has marred the social, cultural, political, and economic landscape of Jamaica for 40 years. Jamaica now experiences some of the highest rates of criminal violence in the world. Easy access to small arms and light weapons—largely through illicit channels linked to the illegal narcotics trade—has fed violent criminal activity, including rising numbers of homicides. In 2010 the intentional homicide rate in Jamaica stood at 52.1 per 100,000, more than seven times the global average of 6.9 per 100,000 (UNODC 2011, pp. 19, 106). Although the homicide numbers in Jamaica have declined significantly since 2009, annual totals—at over 1,000 murders per year—remain at levels consistent with fatality numbers from armed conflicts (see Figure 1).

Figure 1: Serious Violent Crimes in Jamaica, 2009-2012
The 2012 National Security Policy for Jamaica prepared for the Ministry of National Security and the Cabinet Office points to imports of illegal firearms, illegal narcotics, financial frauds, and corruption and extortion as factors that have encouraged extreme criminal violence. It also notes:

These problems have been compounded by the creation of garrison and squatter communities, the misappropriation of public funds, links between politics and organized crime, and the laundering of the proceeds of crime into construction and other legitimate businesses. Criminal gangs have created an environment of fear, which enables them to extort money, coerce and control communities, and intimidate people into silence. (Clayton 2012, p. 2)

Today there is a national consensus that widespread violence and the resulting fear are threats to all forms of development in Jamaica. It is recognized that more must be done—by citizens and institutions alike—to bolster basic human security across the country (see Jamaica 2007, p. v).

Private security companies were established in Jamaica before recent armed violence, but the industry clearly has been influenced by its rise. Some industry spokespeople place the origins of the Jamaican PSC industry in private security services provided during the 1960s to large multinational corporations, mainly in the industrial petroleum and financial sectors. The focus of security services at the time was protection of corporate assets on private property. Others believe that the industry originated in the insecurity arising from increased rates of crime and violence in the 1970s and 1980s. As it became more difficult for police to protect private and public assets, industry and government turned to private security providers. More recently this trend has been replicated in the demand for PSC protection of private residences.

INDUSTRY GROWTH AND DEVELOPMENT
Whatever its origins, the PSC industry in Jamaica experienced dramatic growth during the domestic political upheaval of the late 1970s. The sole PSC industry association, the Jamaica Society for Industrial Security (JSIS), was founded in 1979 to represent the industry in a Tripartite Joint Council comprised of representatives from labour, government, and industry. The JSIS was reorganized in 1989 as more of an industry advocacy group that also promoted best industry practices and conduct. The JSIS currently comprises 28 of the larger Jamaican PSCs, which represent 80 per cent of the industry, according to president George Overton (Kelly 2013).

Since the late 1970s the number of PSCs and employees has increased in response to rising levels of criminal activity and violence, particularly theft, burglary, and robbery. Demand for private security has come not only from traditional corporate clients, but from new customers in the commercial, institutional, and residential markets. As criminal and violent activity has increased and trust has declined in police associated with crime and corruption, the demand for private security services has grown (Campbell & Reid 2005).

The rapid growth of the industry in Jamaica led to the creation of the Private Security Regulation Authority in 1992. According to the PSRA website (2008):

Following the rapid growth in the number of organizations and individuals operating in the Private Security Industry, it became highly desirable that a system be introduced to subject those organizations and individuals to some form of regulation and monitoring.

Demand for industry services has expanded in response to security requirements set by business and government clients. For example, franchise businesses began to require security personnel on the premises of commercial properties operating under their franchise. Following the attacks of September 2001 heightened concerns about acts of terrorism led to more extensive security requirements at airports and marine ports and encouraged greater cooperation between public and private security providers during major international sports and other events.

Several incidents involving inappropriate or illegal activities by industry personnel have prompted calls for improved company regulation and procedures, including more thorough registration, firearms stockpiling, and storage (Plunkett 2005) and better training of private security guards (UPI 2010). As
will be discussed further in more detail below, many guards remain untrained and without proper certification. There are also accusations of industry links to criminals (UPI 2010).

In recent years the industry has seen a market shift from personal to less costly electronic security, driven at least in part by an economy in recession. The growth in electronic security options allows for customized security such as a “panic” alarm system deployed on personal smart phones or tracking devices for management of vehicle fleets using Global Positioning System coordinates. In 2010 two PSCs reported that personal phone alert systems cost J$1,000 per month (Titus 2010). According to one industry expert, the average guard service costs J$600,000 each year per guard. This cost also competes with a one-time capital expenditure of J$390,000 for door access, panic alarm, and a camera system (Collinder 2009).

Current operations of the industry

Size

The total number of companies currently operating in Jamaica is unknown. Despite a legal obligation for private security companies to register with the PSRA, not all PSCs do so. Not all companies offering private security services in the Jamaica telephone book are included in PSRA lists of registered companies. In November 2012 a compilation from telephone directories and related websites revealed that 65 companies in Jamaica offering some form of security services were not registered with the Private Security Regulation Authority. PSRA officials are aware of the existence and operation of unregistered companies. They estimate that a maximum of five per cent of operating PSCs in Jamaica have not registered with the Authority. The PSRA's own audit of the telephone directory has revealed that many unregistered companies provide services that are not subject to PSRA regulation.

The PSRA reports recent figures for the total number of PSCs registered with it. As illustrated by Figure 2, during the eight-year period 2004-2012, the total number of registered companies initially dropped to a low of 211 in fiscal year 2005-2006 and then generally climbed to a high of 279 in FY2011-12.

The PSRA website (PSRA 2013a) reported that as of March 2013 there were 212 registered PSCs operating with a valid PSRA licence (see Appendix 1). PSRA officials note that this total does not necessarily represent a decline in the total of PSCs in Jamaica. The Authority has changed its methodology for compiling the number of registered PSCs and as of 2013 it no longer counts the companies with registration in process that were included in earlier totals. According to Authority officials there were 114 companies at various stages of the licensing process in May 2013, suggesting that under the earlier methodology the total number of registered companies during 2013 would exceed 320.

The PSRA also reports on the number of registered private security personnel in the country; the trend in annual totals parallels the company totals. Figure 3 illustrates personnel totals during the period 2004-2013. From almost 14,000 in FY2004-05 the figure dropped to 12,600 in 2006-07 before climbing steadily to a high of 19,100 in FY 2012-13. The annual totals represent all guards that are registered by the PSRA.

In contrast, the Jamaica Constabulary Force reported that its total strength stood at 8,364 members in March 2010 and 8,925 members in December 2011 (JCF 2011). The ratio of the number of PSC guards to the number of Jamaican police grew from 1.79:1 in 2009-10 to 1.99:1 in 2011-12. In Jamaica today there are approximately two registered private security guards for every police officer.

The Jamaica Observer reported that private security accounts for an estimated five per cent of Jamaica’s Gross Domestic Product (Edwards 2010). From GDP figures published by the Statistical Institute of Jamaica, this equates to estimated industry annual revenues of nearly J$60-billion or about J$272-million per year per registered licensed company. The figure is likely an over-estimate, however, especially when compared with estimated annual guard wage totals and industry costs. Using the cost estimate of J$600,000 per guard provides an annual estimated total of J$9.6-billion for the industry. This figure closely corresponds to industry association estimates of J$10-billion annually. These lower estimated industry revenues represent less than one per cent of GDP for Jamaica.
Type and ownership

PSCs operating in Jamaica range from large multinational conglomerates to small family businesses. Large conglomerates include G4S, the largest multinational PSC in the world, and nationally based groups of companies such as Atlas, Black Hawk Security, Guardsman, Hawkeye, KingAlarm, SecuriPro, and Sentry Force Security. Most large companies have multiple offices in Jamaica and many have divisions that specialize in particular security services. The Atlas and Guardsman groups, for example, have divisions (registered separately by the PSRA) that offer, inter alia, armed services, electronic security systems, and elite protection.

In 2011 there were 17 proprietary (“in-house”) security operations registered by the PSRA. These include in-house security operations of two banks, six hotels or resorts, a number of manufacturing and resource extraction entities (including an aluminum company and a petroleum company), a farm, and a poultry conglomerate of companies, as well as retail outlets. Given the size of the tourist industry in Jamaica and the number of other financial institutions, manufacturing, and resource extraction companies, there are likely more unregistered proprietary operations. Many small companies and tourist hostels contract with only one internal security officer.7

The overwhelming majority of PSCs in Jamaica, including the largest companies, are domestically owned and operated. Subsidiaries of foreign-based conglomerates, such as G4S Jamaica Limited, provide security services from offices in Jamaica. Some foreign corporations provide specialized security technology, such as security equipment for airport and dockside screening. However, ongoing security
services are provided largely by Jamaica-based companies. Some Jamaican-owned companies, including Guardsman and Alternative Security Services, operate in other parts of the Caribbean.

Figure 3: Number of registered private security personnel in Jamaica, 2004-2013

![Graph showing the number of registered private security personnel in Jamaica, 2004-2013.](source: Private Security Regulation Authority)

Services provided

PSCs in Jamaica advertise a wide range of services, including electronic security (cameras and digital recorders, burglary/fire systems, anti-shoplifting systems, access control systems, CCTV, intercom systems, car alarms, automatic gate openers, door buzzers, etc.), locksmith services, vehicle patrols, armed and unarmed guarding, canine response, cash management and ATM servicing, ground support for air courier companies, VIP protection/bodyguard services, undercover officers, investigative services, entertainment and event security management, cash-in-transit services, armoured vehicles, pre-employment screening checks, polygraph testing, security training, firearms training, and risk management consulting. While some companies specialize in one type of security (most often electronic security), most offer a wide range of services that run the gamut from installing electronic security devices to armed protection. A handful of companies offer such specialized services as security and firearms training and risk management consulting.

When surveyed industry respondents were asked to rank the three most important services offered by their companies in order of revenues earned, the combined ranking clearly placed unarmed guarding as the most important revenue source. This service was common to all the companies that responded to the survey. The next ranked revenue sources were armed guarding, followed somewhat distantly by guard dog and armed escort services. (In contrast, a 2011Web-based poll by PSC Quest Security [2013] using the question “What is my greatest security need?” suggested that surveillance and intercom and access
control were the greatest perceived needs, both identified by 20 per cent of respondents. Armed escort was third at 13.3 per cent.)

About 80 per cent of industry respondents stated that their companies employed armed guards. In these companies, between 10 and 30 per cent of guards are armed, according to the respondents. The PSRA reported in June 2013 that out of the total of 19,100 registered guards, 3,280 were certified as armed guards or about 17 per cent of all guards (PSRA 2013b). The website also reported that armed guards were employed by a total of 87 registered companies, or about 40 per cent of all registered PSCs. This suggests that the companies that responded to the survey are more representative of those offering private armed services than of the majority of PSCs in Jamaica.

Markets

Table 1 compiles responses by industry representatives asked to list and rank the client groups or sectors their companies serviced. The second column indicates the number of times each client group or sector was cited in the survey responses. (Each respondent was asked to list all the clients served by their company.) The final column shows the weighted ranking of clients, derived when respondents ranked the top three clients by order of revenue generation. The weighted ranking assigns three to the sector generating the most revenue, two to the next largest and one to the third largest. (Lower ranked sectors were assigned zero.) According to survey respondents the commercial and retail industry is the most important sector for PSCs, both as a source of contracts and for revenue generation. As a revenue source, this sector is followed by banks and financial institutions, government facilities, and hospitality and tourism.

Table 1: Clients and Sectors Served

<table>
<thead>
<tr>
<th>Client group or sector served</th>
<th>Service citations</th>
<th>Weighted ranking</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agricultural and mining industry</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>Banks and financial institutions</td>
<td>5</td>
<td>10</td>
</tr>
<tr>
<td>Commercial and retail</td>
<td>10</td>
<td>12</td>
</tr>
<tr>
<td>Embassies, international organizations</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Government facilities</td>
<td>8</td>
<td>8</td>
</tr>
<tr>
<td>Hospitality and tourism</td>
<td>7</td>
<td>6</td>
</tr>
<tr>
<td>Institutional</td>
<td>5</td>
<td>4</td>
</tr>
<tr>
<td>Manufacturing industry</td>
<td>7</td>
<td>2</td>
</tr>
<tr>
<td>Private residences</td>
<td>6</td>
<td>1</td>
</tr>
<tr>
<td>Transport facilities</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Other (petroleum industry, private citizens)</td>
<td>2</td>
<td>3</td>
</tr>
</tbody>
</table>

The Jamaican government is a major employer of private security companies. Appendix 2 tabulates the companies that were awarded significant security-related contracts by the Jamaican government during the 10-year period 2002-2011. The table was compiled from data in the Searchable National Contracts Commission (NCC) Contract Endorsement Spreadsheet Database (NCC 2011). It reveals that during this period at least 46 companies supplied security services to the government at the Ministries of Agriculture, Health, Justice, and Finance and Planning, as well as the National Works Agency, the National Water Commission, and the Jamaica Urban Transit Company, among other government agencies.

The data reveals significant turnover in the PSCs contracted by government. Twenty-one contractors received single-year contracts (followed by one or more subsequent years with no awards). Only nine received separate government security contracts in four or more years of the decade.
This turnover in government contracts may explain the significant number of companies without a valid PSRA licence by March 2013. Eighteen companies (more than a third) that provided services to the government between 2002 and 2011 did not have valid licences in March 2013. It is notable that most of these 18 did not receive government contracts beyond 2008. It is possible that the loss of government contracts contributed to company demise and hence removed the need for a licence. This cannot be assumed to explain all cases, however, and the high number of unregistered companies in the table deserves closer study.

**Personnel**

As noted in Appendix 1, in March 2013, 16,335 guards were employed by companies with a valid licence. The PSRA data also reveals that most PSC personnel in Jamaica work for a few major companies. More than half of reported guards were employed by the five largest companies (see Table 2). Moreover, only four companies employed more than 1,000 guards. According to PSRA figures, most companies registered as PSCs in Jamaica are small. Indeed, more than half the companies registered in 2013 (111) employed fewer than 10 guards (see Table 3).

Table 2:
Largest registered private security companies in Jamaica by number of guards employed

<table>
<thead>
<tr>
<th>Rank</th>
<th>Company name</th>
<th>Number of guards</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Guardsman Limited</td>
<td>2960</td>
</tr>
<tr>
<td>2</td>
<td>Marksman Limited</td>
<td>2574</td>
</tr>
<tr>
<td>3</td>
<td>Ranger Protection &amp; Security Co. Ltd.</td>
<td>1538</td>
</tr>
<tr>
<td>4</td>
<td>Atlas Protection Limited</td>
<td>1078</td>
</tr>
<tr>
<td>5</td>
<td>Allied Protection Limited</td>
<td>635</td>
</tr>
</tbody>
</table>

Source: PSRA website (accessed April 9, 2013)

Table 3: Number of PSCs by number range of guards employed

<table>
<thead>
<tr>
<th>Range of number of guards</th>
<th>Number of companies in range</th>
</tr>
</thead>
<tbody>
<tr>
<td>&gt;1000</td>
<td>4</td>
</tr>
<tr>
<td>100 – 1000</td>
<td>18</td>
</tr>
<tr>
<td>10 – 99</td>
<td>79</td>
</tr>
<tr>
<td>&lt;10</td>
<td>111</td>
</tr>
</tbody>
</table>

Source: PSRA website (accessed April 9, 2013)

**GENDER OF PERSONNEL**

Survey respondents reported that most employed guards, and the vast majority of armed guards, are male. The gender split for respondents that reported on gender division of company employees was 77 per cent male and 23 per cent female. The split for armed guards was 96 and 4 per cent respectively. Although all but one of the respondents reported that male and female security personnel performed the same duties in the company, the very low reported numbers of female armed guards suggest that women are generally not trained (and selected) for armed services.

One industry respondent stated that the number of women employed by PSCs has steadily increased. According to this source, current applicants for private security positions are mainly women and women are seen as better suited to the work. They perform more consistently (that is, are less likely to be late or absent), are more committed to the work, and are less prone to collusion or corruption.
WAGE RATES
The majority of survey respondents reported that entry-level guards are paid the minimum wage for industrial security guards, which is set and periodically increased by the Ministry of Labour and Social Security. Despite a recommendation from the Jamaica Society for Industrial Security to freeze minimum wages (Jamaica Star Online 2012), in November 2012 the Jamaican government raised the rate to J$183.01 per hour or J$7320.50 for a 40-hour workweek.

Armed guards and guards handling dogs are paid a premium wage rate. In one reported case, the increase over the basic hourly wage is J$36.60 per hour or about a 17 per cent premium over base. Typically, all guards are provided with a laundry allowance.

Other respondents reported current entry-level guard wage rates ranging from a low of J$154 per hour to a high of J$216.31 per hour. Some industry leaders have expressed concern about pay rates that are below minimum wage and the lack of benefits for some guards. In 2012 Donald Williams, the founder of PSC Allied Protection Ltd., brought attention to the plight of some guards when he discussed a recent survey he had conducted. It revealed that some guards were being paid below minimum wage and also were being denied laundry and firearm allowances, and sick and vacation leave (The Gleaner 2012a). Indeed, low wages and lack of benefits are a major source of friction between PSCs and those advocating better employment conditions for guards, including the Labour Ministry.

The typical industry arrangement, whereby duties are subcontracted to guards as independent contractors, is criticized as a cost-saving device that deprives guards of basic employee benefits such as sick leave and paid vacation that they are due. Some industry spokespeople counter that if guards received the advocated benefits, industry charges would need to rise as much as 45 per cent. They also point out that, while security industry employees currently constitute a large pool of unorganized workers, if PSC guards went on strike it would end crucial economic activity in Jamaica. For example, by law all banks in Jamaica must have private security guards on duty. By comparison, in 2010 the entry-level monthly salary for a police constable was J$87,425, including a housing allowance of J$25,680. With the allowance this salary is close to triple the government-set entry-level wage for private security guards.

Public and private sector cooperation
The 2007 National Security Policy for Jamaica (Jamaica 2007) included the private security industry. It noted concern for adequate monitoring of private security firms, especially in relation to the potential misuse of their arms and ammunition. The policy document called for specific actions to improve private security standards and enhance information-sharing and other collaboration between the industry and public security agencies.

Since 2007 national security policy documents appear to have downgraded the role of PSCs in national security. Indeed, the 2012 document A New Approach: National Security Policy for Jamaica 2012 (Clayton 2012), prepared for the Ministry of National Security and the Cabinet Office, does not contain a single reference to private security.

Nevertheless, tangible links between PSCs in Jamaica and government security forces exist, foremost in the direct involvement of former security personnel in PSC operations. With one exception, all survey respondents reported that their companies employed staff who previously had worked with the Jamaica Constabulary Force or the Jamaica Defence Force. In one smaller PSC, about one-quarter of employees were former government security personnel. In 2010 the head of Hawkeye Electronic Security Limited reportedly stated that 30-40 per cent of Hawkeye staff had military or police backgrounds (Chan 2010).

Half of survey respondents also reported that company owners or members of the Board of Directors had been connected to the JCF or JSF. A JCF respondent indicated that active JCF personnel were not encouraged to become PSC owners or Board members to avoid conflicts of interest. However, the practice is not prohibited and JCF members can own or manage a PSC with the permission of the Police Services Commissioner.
In addition PSCs occasionally hire off-duty security personnel. Although several companies reported that
they never hire off-duty staff, an equal number indicated that they hired such personnel between one and
five times in the past year. A JCF official stated that the off-duty contracting of government security
personnel is subject to the government “private service policy.” Under the policy, a division commander
must approve off-duty contracting of personnel. Personnel are contracted on their own time, but are
issued with government uniforms and firearms for private security duties.

Most industry informants reported up to five contacts with the police in the past year. About a third
reported more frequent contact (more than six times). Only one survey respondent reported no contact
with the police over the year. The most common reason for contacting police was to share information.
Police were also contacted while conducting investigations or to report the loss of firearms.

Formal and informal arrangements exist between PSCs and government agencies. The majority of
industry respondents reported that their company had contracts to provide security services to
government ministries and institutions (see Appendix 2). One respondent reported a long-lasting
relationship with the JCF, with the police force providing “advice from time to time.”

The JCF reported that it cooperates with PSCs in specific circumstances such as sports events. The rules
of cooperation are clearly articulated and operational responsibilities for the event are laid out. The PSC
role is limited to the venue and determined by contract details. PSCs also partner with government
agencies in correctional facilities. Some past responsibilities contracted to PSCs—such as prisoner
transfer—have ended, but cooperation in other areas remains.

The national PSC association, the JSIS, agreed to formal Memoranda of Understanding (MoU) with the
JCF on at least two occasions in 2002 and 2010. Both agreements were based on information sharing
(CCTV data, for example) and contact as necessary between security guards and the police. According to
press reports, under the 2002 MoU “private security companies have agreed officially to become part of a
crime-fighting network, serving as the eyes and ears of the police force” (Jamaica Gleaner 2002).

Overview of the current legislation for and regulation of PSCs

PSRA Act and regulations

The private security industry in Jamaica is regulated by the Private Security Regulation Authority Act,
which came into force in 1992 and is supplemented by the Private Security Regulation Authority
(Licensing and Registration) Regulations of 1993. The PSRA Act mandates the establishment of the
Private Security Regulation Authority and provides an overview of the authority’s functions and major
policies, as well as discussing the licensing and registration requirements of PSCs and private security
personnel. The 1993 regulations provide further details on the process of licensing and registration
(including fees), and include application forms that must be completed by companies and security
personnel, as well as an overview of the required training courses for security trainers and security
guards (armed and unarmed). Key features of this legislation follow.

DEFINITIONS

The PSRA Act uses the following definitions for PSCs and security personnel:

Private security organization: a contract security organization, private investigator or a proprietary
security organization.

Contract security organization: an organization operating in the Island which provides security services
(including security surveys and risk analyses) on a contractual basis, with armed or unarmed security
guards, to another organization or person.

Private investigator: a person who performs, on a contractual basis, work involving the search for
evidence, facts or information, including surveillance services.
Proprietary security organization: a company, firm or other organization which has in its employ armed or unarmed security guards for the protection of such company, firm or organization.

The definitions in the Act serve to identify and distinguish among the main types of private security actors and activities in Jamaica. In particular, they differentiate between the operations of PSCs that provide security services as external contractors to companies and individuals (contract security organizations) and the internal operations of companies that maintain a security service as part of company activities (proprietary security organizations).

FUNCTIONS OF THE PSRA
The PSRA Act lays the groundwork for the operation of the PSRA and defines its functions. The main functions of the PSRA are to consider and make determinations on applications for registration and licences and on their renewals, and to monitor the operations of PSCs. To fulfill these functions, the PSRA is also mandated to make enquiries and collect information, as well as “take all such other lawful measures” to carry out its functions.

LICENSING
A licence is required to operate a private security organization. Licences granted under the PSRA Act are valid for up to five years and are renewable. Licences are subject to annual fees; restrictions and conditions may also apply. Licences will be refused to any individual who: is under 18; has an order of bankruptcy made against him (or her) which remains undischarged; has been convicted in the preceding 10 years of certain offences (including under the Dangerous Drugs Act, the Larceny Act, the Firearms Act, the Public Order Act, the Forgery Act, the Malicious Injuries to Property Act, or the Prædial Larceny Act); has a mental or physical disability which would make him (or her) incapable of carrying out the operations for which the licence is required. Licences will be refused to body corporates in cases where: a resolution has been passed or an order has been made by a court of competent jurisdiction for its winding up; a receiver has been appointed to its property; any of its directors have been convicted of an offence (the same as for individuals above); or the company has been convicted in the preceding 10 years of an offence (under the Companies Act, Corruption Prevention Act, Customs Act, Cruelty to Animals Act, the Dangerous Drugs Act or the Larceny Act). The PSRA has the right to cancel licences for the same reasons it may refuse them, as well as for knowingly giving false information.

Temporary licences may be granted from time to time, typically when additional investigations or background checks are required from the Jamaica Constabulary Force domestically or from the National Investigation Bureau in the case of foreign nations. The duration of a temporary licence is 90 days.

To apply for a licence, the applicant (which may be an individual or a company) must complete an application and provide the following type of information, as spelled out in the 1993 supplementary regulations (PSRA 2013c):

- Name of company and individual, address, business name, contact details;
- Type of business (private investigators organization, proprietary security organization, contract security organization, security consulting organization, body guarding organization, security equipment, armoured services, response services);
- Number of employees;
- Number of client locations and client information;
- Names and contact information of company directors;
- Insurance information;
- Details on business (previous licensing under the Act, whether or not the individual is in bankruptcy or the company is in liquidation or receivership, whether or not any Court judgement against the company has been made, whether or not any offence has been committed in Jamaica or another country);
- Details of tax payments and other contributions required by government;
• Indication of whether or not company has licensed firearms. If yes, the applicant must provide the name of the licensee and the number of firearms, as well as complete a supplemental form detailing serial numbers and the calibre of all weapons.

As part of the licensing process, the PSRA conducts inspections of company premises—both inspections in advance of the registration of new companies and periodic inspections of registered companies. In the event of a change of company address or the opening of a new branch office, an inspection occurs before the renewal of a company licence. The inspection reviews physical aspects of company buildings, building security (e.g., grill work, surveillance cameras), and the environs of the buildings. Inspections of existing companies include an examination of company records such as training manuals and logbooks.

The PSRA keeps a list of all companies licensed under the Act. A list of companies with valid licences is publically available on their website and regularly updated.

Licensees under the PSRA are required to inform the PSRA of such events as the dismissal, resignation, or retirement of directors or partners; reasons for dismissal, resignation, retirement, or termination of services of any guards; and names and addresses of any new partner or director. Licensees cannot employ anyone who is not registered under the Act.

REGISTRATION
Every person in Jamaica employed as a private security guard or private investigator must apply to the PSRA to be registered. All licensees and persons registered under the Act will be issued a registration card within 90 days. Individuals under 18 and those convicted of the same offences that preclude individuals from receiving licences are not allowed to register under the Act.

There are four registration categories for security personnel: private investigator, unarmed private security guard, armed private security guard, and security trainer. An application must be completed to be registered as a private investigator. To be registered as a security trainer, the applicant must complete a prescribed training course. To be registered as either an armed or unarmed security guard, applicants must complete the prescribed training course. In addition, armed guards must complete training in the management and use of firearms. Applications for armed or unarmed guards will be refused if a person is incapable, by reason of mental or physical disability, of carrying out the functions of a security guard, or “is not a fit and proper person to be so registered.” To apply for registration as an armed security guard, the applicant must first obtain a valid Firearm User’s (Employee’s) Certificate (FEC) issued under the Firearms Act. It is important to note that this certificate is not a licence, but rather allows the employee to use the firearms of their employer.

To register under the PSRA Act, an applicant must complete the application for registration and sign it in the presence of a PSRA official (PSRA 2013d). The application form requires:

• Two references from among the applicant’s present employer, minister of religion, school principal, justice of the peace, or gazetted officer of the Jamaica Constabulary Force;
• Passport photos certified by the references;
• Employer’s name and address;
• Personal information, including name, address, marital status, occupation, passport number, driver’s licence number, parents’ names, physical descriptors (height, weight, hair colour, etc.);
• Educational information;
• Whether or not applicant has been charged, indicted, or convicted of any offence;
• Whether or not applicant has previously applied for registration, or been registered or employed as a security trainer or guard;
• Previous security-related experience (military, police, private, correctional services, other);
• Previous types of security training;
• Whether or not applicant holds a firearms permit, licence, or certificate;
• Whether or not applicant is a member of Jamaica Constabulary Force or the Jamaica Defence Force.
In addition, the applicant must supply the following:

- Certified copy of his or her birth certificate;
- Tax Payer Registration Number;
- National Insurance Registration Card;
- Either a Driver's Licence, National Identification Card, or valid Passport;
- Recent fingerprint report from the Criminal Records Office (less than six months old, purchased from the Ministry of National Security);
- Certified copy of the Marriage Certificate if the applicant is a married woman using her married name; and
- Payment of prescribed fee.

The application also involves an interview by a Private Security Regulation Authority Officer. Persons registered under the Act must inform the PSRA of any changes in their employment status.

TRAINING REQUIREMENTS

The 1993 Supplementary Regulations give an overview of the training required before armed and unarmed security guards and trainers can be registered. The Basic Training for Security Trainers includes modules on principles of security, basic human and social psychology, communication skills, legal aspects of security, stress management, management skills, self-defence, first aid, operational instructions, tactical skills, firefighting, protocol, and grooming. Armed and unarmed guards must complete the Basic Training Course for Armed and Unarmed Security Guards, which consists of a minimum of 80 hours of training over two weeks. The training must be conducted by a trainer approved and registered under the PSRA, or by the JCF or JDF, or by a person who is exempted from registration based on their experiences. The training course is the same as the one for Security Trainers, minus the modules on operational instructions and management skills. Armed guards must complete an additional 12 hours and 10 minutes of training on firearms, plus firing range practice. The training course on firearms includes modules on the history and development of firearms, the Firearms Act, legal and moral responsibilities of firearms users, the structure of firearms, safe handling of weapons, care and maintenance of weapons, carrying and use of weapons, principles of shooting, range firing, a written test, and evaluation.

Although training requirements were stipulated in the Act when it entered into force in 1992, the PSRA began to take the issue of training much more seriously in 2006. Together with HEART Trust/National Training Agency (NTA), in 2006 the PSRA helped to develop a national training curriculum known as Industrial Security Operations NVQ-J Level 1. Companies were informed in 2008 that their licences would not be renewed until their guards had completed this training course (with a grace period of three years). Companies were also encouraged to send their training personnel to complete the NVQ-J Level 4 Training and Assessment Certification Course to be certified trainers. Security trainers must complete this course before licences will be renewed.

TREATMENT OF FIREARMS

The PSRA Act does not contain a specific section on firearms, although the use of firearms as it relates to the duties of licensees and registrants is covered. When applying for a licence under the PSRA Act, applicants must indicate whether or not they have a firearms licence and list any firearms in their possession. If the licence of a private security organization is cancelled, all firearms and ammunition owned or used by the organization must be turned over to the appropriate authority, as stipulated by the Firearms Act.

In Jamaica the Firearms Act mandates the Firearm Licensing Authority (FLA) to regulate all aspects of firearms possession and use, including ownership, sale, transfer, and disposal. To possess or use a firearm, an applicant must apply to the FLA for a Firearm User's Licence (FUL) and provide details on all firearms to be covered by the licence. The FLA issues Firearm Dealer’s Licences for the international transfer and domestic sale of firearms and specific sales are subject to FLA approval of export and import permits.
Before applying for registration as an armed guard, the applicant must possess a Firearm User’s (Employee’s) Certificate. As noted above, this Certificate is not the equivalent of a Firearm User’s Licence. The PSC for which the applicant works must have a Firearm User’s Licence, which is typically issued to a company officer. The FEC permits employees to use the firearms of their employer. It authorizes holders “to keep, carry and use in connection with the business of the holder of such Firearm User’s Licence the particular firearms specified in such certificate and such ammunition therefor as may be so specified” (Firearms Act, 1967, Section 30:30).

The process to obtain a certificate is shorter than the process required to obtain a Firearm User’s License or Permit. Figure 4, taken from the FLA website, outlines the first six stages of the application process for the FUL and the FEC. Because the FEC does not lead to firearms ownership, its process omits the final two stages necessary to FUL approval: acquisition and ballistics testing.

The only specific reference to the use of firearms in the PSRA Act is in section 28.1: “No licensee or other person registered under this Act who employs private investigators or security guards shall allow any private investigators or security guards to have possession of the firearms of the licensee except where the private investigators or security guards are engaged in lawful execution of their duties.”

PSC guard training and weapons use

Minimum entry qualifications

According to company survey respondents, to meet minimum entry requirements security guards must be in good health and meet PSRA standards, including a background check on their police records and successful completion of the basic training course (see above). Education requirements vary, but most companies require some high school qualifications up to and including a high school certificate and “O” levels. Age requirements also vary; some companies have specific age limits (for example, the applicant must be over 25 or under 65). One company required at least one year of experience in the security industry.

Training

The Industrial Security Operations NVQ-J Level 1 curriculum established by the PSRA includes training in such core areas as providing first aid, managing conflict in the workplace, crowd control, maintaining property security, and employing batons and handcuffs. Successful completion of the curriculum requires competency in all core areas as well as completion of two electives such as data entry and retrieval and canine handling for security patrol. The NVQ-J curriculum does not cover firearms training (see PSRA & HEART Trust/NTA n.d.).

Allied Protection Limited is the sole private company that is an Accredited Training Organization qualified by PSRA to provide NVQ-J curriculum training, including of personnel hired by other PSCs. In late 2012 the PSRA reported that 152 guards had completed certification through Allied Protection.

Most PSC respondents reported that their companies provide their own training programs for new personnel, based on the PSRA curriculum. These in-house training programs use a variety of trainers including accredited PSRA trainers, external experts such as ex-military personnel, and company staff. Training details vary, although most reported that the program’s duration was 80 hours. One surveyed company reported that it did not train guards, but did provide “refresher” courses to previously trained employees.

The variety of approaches to guard training can be attributed at least in part to a lack of PSRA-accredited training facilities. The single facility provided by Allied Protection does not have the capacity to train the current number of entry-level guards. So, PSCs tailor training programs to their own needs and resources, which vary by company service and size. The training is not necessarily at the level of PSRA certification.
Indeed, the surveys indicate that more than a year after the 2011 PSRA deadline, there are guards who have not obtained NVQ-J Level 1 certification. Half the PSC officials surveyed were reluctant to report the number of company employees who had completed the certification. Some reported that a majority of guards were certified. One company indicated that none of its employees had completed the course. No respondent reported that all company guards met the required standard. Industry officials have attributed the delay not only to the lack of accredited training facilities, but to a slow adoption of professional standards where none existed before. Other industry experts have noted that some companies are reluctant to send employee guards for external training for fear that they will be “poached” by other PSCs seeking pre-trained workers.¹⁰

The PSRA is also working with the Tourism Product Development Company to provide formal training for guards employed by small villas and guest houses. Unlike the larger hotels, which employ security guards under PSC contracts, the smaller facilities use proprietary (in-house) security guards or individually contracted guards.

More advanced and specialized security training is available. The private company Security Administrators Limited (SAL) provides the Port Facility Security Officers training course that “has become the standard for the Caribbean” (Gleaner 2011). The Caribbean Maritime Institute (2013) offers a Bachelor of Science degree in security administration and management, aimed at students interested in advancing “their career in both land base, sea and airport security units.”

**Training of armed guards**

Company respondents report that the training security personnel undertake before they can carry firearms is conducted by FLA instructors or by company instructors using FLA standards. Trained personnel must pass a test using a standard point system to determine the candidate’s knowledge and skill in both theory and practical application.

FEC applicants require a security clearance equivalent to the “Security Clearance and Investigation” stage of the Firearm User’s Licence to possess and carry a firearm (see Figure 4). This involves examination of possible criminal history, covert intelligence information, narcotics involvement, and overseas residence. The FLA relies on the JCF for background criminal records checks. As needed, the FLA conducts a local interview with PSC officials.

The industry has complained about the length of time taken to conduct the security clearance for FECs. Delays may be attributed in part to the increased number of applications in recent years. According to FLA data released to The Gleaner, the number of certificates issued increased dramatically from none in 2007 to 367 in 2010 (with 71 in 2008 and 144 in 2009) (Reid 2011).

The JCF maintains a database that includes information on the criminal status of deportees—Jamaican nationals convicted of crimes overseas and deported to Jamaica. According to one JCF official, a deportee would not necessarily be prevented from obtaining a firearm. The decision is left to the person granting the licence.

Although the decision has not yet been announced, the FLA is going to accept that security clearance has been met if a PSC employee has registered with and been approved by the PSRA.

To get an FEC, an applicant must also obtain clearance in Firearms Competence. The applicant must take practical training on a firearms range and pass a shooting test with 80 per cent accuracy. The earlier standard of 100 per cent accuracy and the need to pass a written examination were both dropped from FLA requirements in 2009 (Reid 2011).
Weapons acquisition and type

Weapons acquisition by PSCs is regulated by the Firearm Licensing Authority. The firearms application process under the Jamaica Firearms Act is directed at individual firearms users. To legally possess and use firearms, private security companies apply for the same Firearm User’s Licence granted to individual civilians. Although the companies are deemed the legal firearms owners, FULs are issued to principals within the PSC, not the company. There are no additional considerations for a PSC application. According to interviewed officials, the FLA plans to change regulations so that FULs are issued to the PSCs.

The PSC industry remains critical of delays in processing FUL applications, which are generally attributed to the time taken by the JCF in providing security clearances of applicants. In November 2012 the acting chief executive officer of the FLA told a parliamentary committee that the backlog of applications had been cut in half to 2,000 (Gleaner 2012b). The same month the agency opened an office in Montego Bay to serve western Jamaica (Hines 2012). This office is also expected to help to reduce the time to process licence applications.
While PSCs are free to apply for a licence for a restricted weapon, FLA officials are not aware of any such cases. Some clients stipulate in contracts the types of firearms that armed guards must carry. For example, one embassy stipulates the use of 9 mm pistols by local contracted armed guards.

The FLA has not set standards for the number of firearms covered by one licence to a PSC officer. Each case is handled separately. Determining factors include the number of guards, the number of clients, and specific needs of clients. Some companies develop their own standard; for example, one company provides one weapon for every three armed guards.

Private security companies surveyed in this study reported the purchase of all firearms from local licensed dealers. In principle, PSCs would be eligible to apply for a Firearms Import Permit to purchase guns from offshore, but respondents did not cite any instance when this had occurred.

Respondents reported that armed guards were equipped with pistols, revolvers, shotguns, rifles, and semi-automatics (in declining order of frequency). According to FLA officials, the most common firearms used by PSCs are .38 calibre revolvers and 12 gauge shotguns. A police spokesperson pointed to semi-automatics as the preferred weapons of PSCs (and citizens). More generally, the type of weapon carried or used depends on client requests, location and type of duties, and threat or exposure assessments. For example, some duties and client requests call for concealed weapons. Armed escorts of monetary shipments typically require shotguns.

The amount of ammunition available to PSCs is established by the Firearm User’s Licence. Each FUL prescribes a set amount of ammunition for the licensed firearm. Pistols and other handguns are allotted 50 rounds of ammunition per year per weapon. Each shotgun is allowed 250 shells per year. In addition, FULs allow a prescribed quantity of ammunition every year for training purposes, allocated on a quarterly basis. Each allocation must be accounted for (via an Accountability of Ammunition Expended form) before the next quarterly allocation is permitted.

Weapons tracking and stockpiling

The FLA Audit and Compliance Unit requires that PSCs maintain registries of company firearms. It checks company stockpile management, including the security of stored weapons. Although FULs are valid for five years, PSCs must make an annual declaration that the conditions for which the licences were issued still apply.

Respondents reported that their companies maintained registers of weapons and ammunition as required by FLA. Both manual and computer-based record keeping are used. Weapons and ammunition are typically stored on company premises. Several respondents use safes or vaults for weapons storage—in one case a steel safe in a concrete vault. One company, however, reported that employees were permitted to store weapons in a secure safe at their homes. Distribution of ammunition is also controlled and documented.

Most companies report managerial oversight of a firearms sign-in and sign-out process to monitor and track the use and storage of company weapons. They conduct regular, even daily, internal audits of firearms records. One company performs a quarterly audit of ammunition stores. Only employees with the required Firearm User’s Certificate can sign out and sign in weapons.

Surplus and decommissioned weapons can be turned over to the FLA, but this is not universal practice. At least one company reports firearms no longer in use to the FLA, but retains them for parts.

Problems with weapons use

PSCs are aware that all discharges of firearms must be reported to the police. The Jamaica Constabulary Force includes the FLA in investigations if there appears to be a breach of licence conditions. Weapons use is treated seriously and armed PSC personnel are instructed to threaten to use, or use, weapons only
when life or property is under serious threat. According to one respondent, armed guards and police operate under the same instructions.

A JCF respondent stated that guards have the same rights as private citizens. Any citizen or guard who observes a crime can apprehend the suspect, but must hand the person over to the police. The only force acceptable in such circumstances is for self-defence. However, protection of client property is not deemed an improper use of force. Force may be used to reinforce physical barriers and to remove a person from client property, but it must be proportional.

Industry respondents reported few problems related to the management and use of firearms and ammunition by armed security personnel. A few noted the theft of firearms and ammunition, and the negligent discharge or other misuse of weapons. The JCF reported that in addition to lost or stolen firearms and ammunition, there have been problems with loans of PSC weapons to unauthorized users. (This problem is found among the police as well.)

**Assessment of current industry regulations and practice**

*Government amendments*

For almost a decade the Jamaican government has been aware that the PSRA Act needed to be amended to strengthen regulation of a changing and growing industry. The drafting of PSRA Act Amendments began in December 2004 as a priority concern. By April 2006 the proposed amendments had lost their priority designation and not progressed beyond the drafting stage. In November 2007 the rationale for the proposed amendments changed from making the Act “more relevant” to “updat[ing] legislation to respond to developments within the industry.” In 2010 specific changes to the PSRA Act were outlined for the first time. These included:

- Increase fees and fines;
- Amend Section 12 to widen the circumstances under which licences can be revoked or refused;
- Amend Amend Section 17 to provide an exception under the Companies Act “to lift the corporate veil” to ascertain the identities of company directors and shareholders.

By 2012 the Amendments were once again designated a priority (Cabinet Office 2012).

The proposed amendments correspond to criticisms and concerns about existing regulations that were raised by PSRA officials in interviews. Officials noted, for example, that PSRA fines are not commensurate with infractions. PSRA Executive Director Rosalyn Campbell raised this concern in 2006: “The 1992 act that governs the body does not have enough ‘teeth’ to enforce regulations on private security companies. According to this present Act, whenever there is a violation, the offending security company is placed before the Resident Magistrate’s Court and if proven guilty, is fined $10,000” (Titus 2006). A fine of this size is not a significant deterrent. A proposed amendment to increase fines directly addresses this weakness.

Campbell also noted that “our inspectors are not authorized persons. We cannot go in and demand an inspection of registers or things like that” (Titus 2006). The proposed amendment to widen the circumstances under which licences can be revoked or refused begins to address officials’ concerns. More detail on the proposal is needed, however, to determine its likely outcome and efficacy.

The amendment objective to “lift the corporate veil” is motivated by the limited information on the control and ownership of PSCs that is currently required. More detailed corporate information could aid in the exposure of criminal links within the management and ownership of PSCs. Such links have been documented in the past. Press reports revealed that Christopher “Dudus” Coke—whose extradition to the United States on criminal charges in 2010 sparked extensive violence in West Kingston—was a major shareholder of Bull’s Eye Security Services Limited (Gleaner 2010). The extent to which the proposed amendment would strengthen oversight of company activities is not apparent, however.
Concerns regarding requirements for, and processing of, forms and reports are not addressed in existing proposed amendments. This suggests that paperwork delays will continue to negatively affect the operations of the PSRA.

**Industry views**

Industry respondents were asked to assess the effectiveness of the PSRA and the FLA as well as the PSC industry itself in some key regulatory areas. Each respondent determined the level of agreement with the six statements in the first column of Table 4 below using a range from 1 (strongly disagree) to 5 (strongly agree). Assigning the number 3 indicated a neutral or undecided view.

Table 4 suggests that industry respondents believe that the PSRA is doing a good job of handling licence approvals in a timely manner. There is also support for a Code of Conduct to regulate the industry. Other responses suggest a range of views—or weakly held views—by the industry. It is nevertheless worth noting that the FLA’s ability to handle applications in a timely way was the only statement in which the average fell on the “disagree” side of the scale.

**Table 4: Industry views on regulatory practice**

<table>
<thead>
<tr>
<th>Statement on industry regulation and practice</th>
<th>Average level of agreement</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Private Security Regulation Authority (PSRA) is able to handle approval of licences and registrations in a timely manner.</td>
<td>4.1</td>
</tr>
<tr>
<td>The PSRA is able to ensure that private security companies are operating within the rules and regulations prescribed by law.</td>
<td>3.6</td>
</tr>
<tr>
<td>The PSRA is able to provide guidance in training of private security personnel.</td>
<td>3.4</td>
</tr>
<tr>
<td>The Firearm Licensing Authority is able to handle applications in a timely way.</td>
<td>2.8</td>
</tr>
<tr>
<td>There are some “bad apples” in the private security industry and the authorities are able to deal with them.</td>
<td>3.3</td>
</tr>
<tr>
<td>If private security companies agree to a Code of Conduct among themselves this will be an effective way of regulating the industry.</td>
<td>3.9</td>
</tr>
</tbody>
</table>

One industry expert responded to a request to rate the effectiveness of the oversight functions of all government agencies involved in PSC regulation in Jamaica. The results are shown in Table 5. The first column of the table lists government oversight functions associated with PSCs. The second column indicates the government agency responsible for oversight. The third column provides a rating of government effectiveness provided by the expert PSC industry respondent (1= Poor; 5= Excellent). A blank indicates that no rating was assigned. In the final column the respondent identifies specific problems and suggests improvements.

**Media portrayal of the industry**

Jamaican press reports highlight both positive and negative aspects of the private security industry and give some insight into how the public perceives PSCs.

**Public-Private Relations:** Several articles refer to the relationship between public and private security forces in Jamaica. For the most part, the relationship is painted in a positive light. In an article by Bart Chan (2010), Deputy Commissioner of Police Glenmore Hinds states that there is a “good relationship” between the JCF and the security industry, and that PSCs are an asset to police because of the information they provide. The article also notes that in 2002 the Jamaica Society for Industrial Security and the police signed an information-sharing agreement that has led to better cooperation between public and private forces. The presence of PSCs in certain regions also means that fewer police are needed, freeing the JCF for other work.
An article by Al Edwards (2010) echoes this sentiment. The article covers an event to discuss public-private partnerships hosted by Kenny Benjamin, chairman of Guardsman Limited. Benjamin advocates the primacy and importance of public-private relationships and a less fragmented view of security. Chief Security Officer of Alcoa International, Major Noel Williams, also stressed the point that private firms can help taxed police forces and emphasized that proper training is integral to this. Leslie Greer of the Criminal Investigation Branch of the JCF noted that collaborative work between private firms, the JCF, and the JDF had contributed to a significant reduction in murders and shootings in the Tivoli area. She cautioned, however, that if more public-private partnerships were to be contemplated, clear roles and duties needed to be spelled out. Chief of Defence Staff of JDF, Major General Anthony Anderson, cited the successful public-private cooperation in planning the ICC Cricket World Cup in 2007; he is encouraged because the private sector is leading the conversation on public-private partnerships.

PSC personnel reveal another significant public-private overlap. PSCs seem to prefer to hire people with police or military backgrounds. John Azar, managing director at KingAlarm, prefers to employ ex-military people “because of some of the traits that are taught in the military.” Still, his firm checks with the anti-corruption branch before employing former police or military (Chan 2010).

*Problems in the Private Security Sector*: Although media coverage of PSCs is often positive (perhaps because of the efforts of a few key industry leaders), some press articles highlight problems and concerns relating to PSCs. One particularly critical article by United Press International (2010) charges that, although some gains have been made in terms of standardizing business conduct, the security industry “is virtually out of control and needs to be brought into line within the regulatory framework.”

Kimmo Mathews (2011) reported on the fallout of a daring daytime robbery in which the car of three armed guards was hit by another car; when the guards got out to inspect the damage occupants of the second car held them up, stealing $50-million in cash, intended for local banks, and a .38 revolver (ReGGae 2011). In addition to sparking discussion about insurance coverage, the incident raised questions about the training and motives of the guards. One private security operator pointed out that basic training should have caused the guards to drive immediately to a police station, rather than get out of their vehicle. Other commenters speculated that the guards were either inept or somehow involved in the plot. The theft of a revolver in addition to the money highlights the potential for diverting arms from PSCs into the illicit market.

Dennie Quill (2010) noted that the rapid growth of the industry has made it more likely for the general public to encounter private security guards than police. Yet, he lamented, most of the guards he has encountered are “very crude and totally hostile to members of the public. Guards believe the uniform gives them authority and a gun gives them power.” He cites instances of guards abusing members of the public. Quill also contends that security firms don’t invest enough in training their employees, turnover is high, few companies perform background checks, and guards are very poorly monitored and regulated.

In summary, problems in the industry cited in press reports since 2006 include:

- Members of illegal groups have infiltrated private security companies.
- Security personnel remain untrained in spite of PSRA regulations. Poor training has been a factor in robberies and other incidents in which guards acted inappropriately.
- Guards have been caught carrying and using firearms without a licence or permit.
- PSCs dodge compliance and inspections by the PSRA.
- As contract workers, security guards are paid below minimum wage and denied allowances and leave.
Table 5: Government oversight of PSCs and PSC firearms

<table>
<thead>
<tr>
<th>Oversight function</th>
<th>Agency</th>
<th>Rating</th>
<th>What is the problem for PSCs? Suggestions for improvement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Licensing of private security companies</td>
<td>PSRA</td>
<td></td>
<td>Very little benefit to PSCs by being licensed. PSRA does not enforce sanctions on those who do not comply with licensing provisions.</td>
</tr>
<tr>
<td>Registration of private security officers</td>
<td>PSRA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Background checks of private security officers/company principals</td>
<td>JCF/PSRA</td>
<td></td>
<td>Only background checks on prior criminal records and those pending in court. Checks are restricted to local records only—there are no international checks. This is a deficiency, especially as it relates to deportees.</td>
</tr>
<tr>
<td>Granting of Firearm User's Licences</td>
<td>FLA</td>
<td>1</td>
<td>Backlog and complicated process. Four different entities are involved. PSCs are like a ‘football’ for the Jamaican government. Better to be solely under the Ministry of National Security if PSCs are to play a critical role in national security.</td>
</tr>
<tr>
<td>Granting of Firearm Employee's Certificates</td>
<td>FLA</td>
<td>1</td>
<td>Backlog, slow.</td>
</tr>
<tr>
<td>Marking firearms of PSCs</td>
<td>FLA</td>
<td></td>
<td>Not yet started.</td>
</tr>
<tr>
<td>Firearms deployment and use within companies</td>
<td>FLA</td>
<td>5</td>
<td>Regulations governing acquisition firearms are pretty airtight.</td>
</tr>
<tr>
<td>Inspection of PSC offices and firearms depots</td>
<td>JCF/PSRA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Secure storage/stockpiling of firearms and ammunition by PSCs</td>
<td>FLA</td>
<td>5</td>
<td>Annual audits to reconcile stockpiles with reported figures.</td>
</tr>
<tr>
<td>Discharge of firearms in the course of duty</td>
<td>JCF</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Use of ammunition by PSCs, amount of ammunition expended</td>
<td>FLA</td>
<td>5</td>
<td>Acquisition of ammunition in doubt because there are cases of illegally acquired ammunition.</td>
</tr>
<tr>
<td>Disposal of firearms decommissioned or no longer needed</td>
<td>JCF</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Recordkeeping by PSCs</td>
<td>PSRA</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Revocation of firearm licences and certificates</td>
<td>FLA</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Investigate violations of Firearms Act or PSRA Act</td>
<td>JCF</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Audits of logs, manuals, records</td>
<td>PSRA</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Observations and recommendations

The following observations and recommendations arise from the desk and field research undertaken for this case study. They are intended to reflect the major PSC issues and concerns that have arisen in the Jamaican context. They are presented as a starting point for a multi-sector discussion of policy and practice to advance awareness and regulation of the industry across the Caribbean region.

**Observation 1: PSC regulation in Jamaica provides a unique Caribbean example and learning opportunities for other countries in the subregion.**

The entry into force of the PSRA Act in 1992 put Jamaica in a unique position in the Caribbean. The Private Security Regulation Authority created under the Act became the first authority in the region to regulate a national industry. Now, with more than 20 years of policies and practice under PSC regulation, the Jamaican experience should be of interest across the region to private security companies and industry associations, regulators, policy analysts, and the interested public.

The PSRA could make a significant contribution to advancing private security industry regulation in the broader CARICOM subregion. As a starting point, the Caribbean Community (CARICOM) could consider providing opportunities and resources for PSRA briefings of CARICOM member states on its experience in PSC regulation.

**Recommendation 1: The Jamaican experience in PSC regulation through the PSRA should be shared with appropriate regulatory agencies and other relevant parties in all CARICOM member states.**

**Observation 2: The PSC industry is not fully regulated in Jamaica.**

The PSRA has established exacting requirements and procedures to license private security companies and register security guards. Companies are legally obligated under the PSRA Act to seek operating licences and ensure that their employees obtain the appropriate certificates. If all PSCs fulfilled these obligations, the industry arguably would operate at higher standards.

The evidence indicates that an unknown number—likely many—PSCs in Jamaica operate without PSRA licences. This appears to be particularly true of smaller PSC operations, including proprietary services for the tourism industry. By extrapolation, it can be assumed that many security guards in Jamaica are employed without PSRA registration and have not met the training requirements of professional personnel.

In proposals for amendments to the PSRA Act, the Jamaican government recognizes that the existing Act cannot fully regulate the industry. Fines for offences are inadequate and PRSA officials do not have adequate power to inspect PSC facilities and operations—licensed or unlicensed. The JSIS and industry representatives also support improved powers of regulation, not only to improve industry standards, but, we can surmise, to remove any competitive edge of unregulated companies.

A non-punitive track to strengthen regulation of the industry is possible. With sufficient resources, the PSRA could conduct information and awareness campaigns that encourage companies, clients, and PSC personnel to meet their legal obligations. At the same time, the PSRA inspectorate branch should be expanded and better funded, not only to more effectively enforce legal compliance by PSCs but also to gather “intelligence” from field visits to better inform ongoing industry regulation. Through Act amendments, the PSRA must be given the powers to impose disincentives to regulatory infractions, perhaps via a tiered process beginning with fines and stepping up to prosecution and licence revocation.

**Recommendation 2: The PSRA should be given the legal authority and resources to encourage and impose national PSC regulations and standards and, as necessary, prosecute offenders.**
**Observation 3: PSC personnel training is incomplete.**

Although the PSRA sets out the coursework necessary for the training of private security guards, it is not able to ensure that all guards receive adequate training and pass the necessary tests. The PSRA does not have the capacity to train guards at its own facilities, where it could maintain common training standards. Instead, it must rely on a patchwork of training procedures that blends individual certified trainers and industry in-house training that may or may not cover all the PSRA course material. PSRA efforts to have PSCs reach the NVQ-J Level 1 certification of all guards by the end of 2011 failed; the goal is not likely to be reached soon.

Additionally, the Firearm Licensing Authority is challenged to maintain the firearms competence of armed guards. It could raise competence standards by increasing the frequency of firearms training and testing.

With a regional (indeed a global) trend to “outsource” security responsibilities to private security companies, there is a growing need for trained, professional personnel who seek a career in the sector. There are incentives for all private security actors to jointly establish and promote a standard, flexible guard training program given at one or more educational institutions to provide qualified, professional personnel. For the PSRA, a standard course to attain NVQ-J Level 1 certification would advance the authority’s goal of professional training and certification of all private security guards.

PSCs could be given the option of sending company trainees to attend the program at a certified institution or of seeking certification from the PSRA to train their employees in-house. Standard coursework and examinations would mean that the industry could hire guards with prior certification. A flexible program could adapt to changes in the industry, including the growing use of sophisticated electronic technologies. If background checks by the JCF were conducted while applying to or during an institutional program, delays in processing guard certification could be reduced or eliminated. Finally, more frequent firearms competence testing by the Firearms Licensing Authority would mean that armed guards would be trained to a higher standard.

Establishing a standard approach to guard training and certification is one way to advance basic training. Other options might be better suited to industry and regulatory needs and resources, but would best emerge during consultations involving all vested parties.

**Recommendation 3: An innovative multi-sector approach to guard training, with buy-in from the PSRA, FLA, PSCs, and educational institutions and experts, could provide options for improved, standardized, and swifter training and certification of PSC guards.**

**Observation 4: Variations in wages and gender participation indicate a lack of common standards in employee benefits and responsibilities.**

Evidence from survey questionnaires suggests that, although most PSC guards are paid the minimum wage established by the Ministry of Labour and Social Security, some companies pay less—even significantly less. And while there may be more women seeking to become private security guards, they are not being trained as armed guards or for other roles that carry higher wages and responsibilities.

Proposed amendments to the PSRA Act include PSRA-mandated minimum standards for employee conditions and benefits. It is not clear, however, when the amendments will be approved. In the interim, the leading members of the PSC industry could develop a best-practice approach to employee standards that could be backed by a PSRA-led industrial tribunal to settle disputes. Such an approach could reduce and prevent poaching of trained employees as an immediate benefit to PSCs. Better employee conditions also will strengthen industry performance and professionalism and isolate companies that use low wages for competitive advantage. As well, improved standard wages and other benefits could provide incentives for employees to seek better education and training before applying for jobs with PSCs.

**Recommendation 4: With support from the PSRA, the industry should develop and adopt common best practices to standardize employee benefits, conditions, and responsibilities.**
Observation 5: The private security industry in Jamaica is not fully integrated into current national security policy and practice.

As noted earlier, recent government policy appears to have downgraded the role of PSCs in national security. *A New Approach: National Security Policy for Jamaica 2012* does not mention private security, which suggests that the Jamaican government does not see a significant role for the industry in promoting national security. Moreover, industry complaints about licence and certificate backlogs and the complexities of regulatory approval could be taken to indicate low government priority for PSCs.

The challenges and potential value of the private security industry for national security suggest that government security policy should give this sector higher priority. One challenge relates to inadequate storage and inappropriate use of firearms and ammunition by PSCs. Equally important, however, are the potential contributions PSCs can make to national security, especially when the number of registered private security guards is double that of police. With more public-private security collaboration PSCs can provide a security resource to complement public security agencies and forces. The Memorandum of Understanding between larger PSCs (as represented by the JSIS) and the JCF is a laudable step toward such collaboration, but efforts to include a wider segment of the industry are needed.

One step to better integration of PSCs in the national security program lies in improved coordination among the government agencies responsible for industry regulation. One suggestion is that the PSRA oversee all licensing and certification of PSCs and guards—including firearms licensing, while the Firearm Licensing Authority and the Jamaica Constabulary Force provide appropriate expertise and support. Whatever the approach, more intra-government coordination to streamline PSC regulatory processes will be necessary for any public-private ventures to succeed.

**Recommendation 5: The National Security Policy for Jamaica should pay specific attention to both the regulation of PSCs and their role in enhancing security in Jamaica, so that PSCs are effectively regulated and integrated into the national security program.**
### Appendix 1: Registered security companies with valid licence for 2013

(Source: Private Security Regulation Authority)  
Last Updated: March 25, 2013

<table>
<thead>
<tr>
<th>Company name</th>
<th>Number of guards employed</th>
<th>Expiry date</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.P. SECURITY SERVICES LIMITED</td>
<td>23</td>
<td>17-May-13</td>
</tr>
<tr>
<td>A &amp; D SECURITY SERVICE LIMITED</td>
<td>2</td>
<td>14-May-13</td>
</tr>
<tr>
<td>A B INVESTIGATION SERVICES LIMITED</td>
<td>1</td>
<td>8-Apr-13</td>
</tr>
<tr>
<td>A CLASS SECURITY</td>
<td>1</td>
<td>11-Jan-13</td>
</tr>
<tr>
<td>ACTION SECURITY COMPANY LTD.</td>
<td>15</td>
<td>31-Oct-12</td>
</tr>
<tr>
<td>ADAMS’ SECURITY MANAGEMENT UNIT LIMITED</td>
<td>30</td>
<td>1-Dec-13</td>
</tr>
<tr>
<td>ADVANCED PRECISION SECURITY SERVICES LTD</td>
<td>8</td>
<td>30-Oct-13</td>
</tr>
<tr>
<td>AEGEAN PROTECTION SECURITY SERVS. LTD.</td>
<td>29</td>
<td>14-Aug-13</td>
</tr>
<tr>
<td>ALBION SECURITY COMPANY LIMITED</td>
<td>29</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>ALKALI LIMITED</td>
<td>4</td>
<td>31-Oct-12</td>
</tr>
<tr>
<td>ALL STARS INVESTIGATION SERVICES</td>
<td>1</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>ALLANGLES INVEST. &amp; SEC. SERVS. LTD.</td>
<td>5</td>
<td>22-Apr-13</td>
</tr>
<tr>
<td>ALLIED PROTECTION LIMITED</td>
<td>635</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>ALUMINA PARTNERS OF JAMAICA</td>
<td>1</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>AMBANCE RESORT PROPERTIES INC.</td>
<td>13</td>
<td>31-Oct-12</td>
</tr>
<tr>
<td>ARMEX SECURITY SERVICES LTD.</td>
<td>7</td>
<td>10-Nov-13</td>
</tr>
<tr>
<td>ARMOUR SECURITY SERVICES LIMITED</td>
<td>79</td>
<td>31-Jul-13</td>
</tr>
<tr>
<td>ARROW HEAD PROTECTIVE SERVICES LIMITED</td>
<td>1</td>
<td>3-Dec-13</td>
</tr>
<tr>
<td>ASPRO SECURITY LIMITED</td>
<td>12</td>
<td>9-Feb-13</td>
</tr>
<tr>
<td>ASSET PROTECTIVE SERVICES COMPANY LTD.</td>
<td>10</td>
<td>30-Oct-12</td>
</tr>
<tr>
<td>ASSURANCE SECURITY CO. LIMITED</td>
<td>2</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>ATLAS ARMOURDED SERVICES LIMITED</td>
<td>87</td>
<td>31-Oct-12</td>
</tr>
<tr>
<td>ATLAS PROTECTION (OCHO RIOS) LIMITED</td>
<td>430</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>ATLAS PROTECTION LIMITED</td>
<td>1078</td>
<td>31-Oct-12</td>
</tr>
<tr>
<td>BALLISTIC SECURITY &amp; CONSULTANT LTD.</td>
<td>6</td>
<td>9-Mar-13</td>
</tr>
<tr>
<td>BANK OF JAMAICA</td>
<td>38</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>BANK OF NOVA SCOTIA JA. LTD.</td>
<td>18</td>
<td>31-Mar-13</td>
</tr>
<tr>
<td>BARTH’S SECURITY SERVICES LTD.</td>
<td>1</td>
<td>15-Nov-13</td>
</tr>
<tr>
<td>BIGMAN SECURITY SERVICES LIMITED</td>
<td>17</td>
<td>31-Jan-13</td>
</tr>
<tr>
<td>BINOC VISIONS INVESTIGATIONS LIMITED</td>
<td>6</td>
<td>30-Jun-13</td>
</tr>
<tr>
<td>BOLD SECURITY LIMITED</td>
<td>1</td>
<td>19-Sep-13</td>
</tr>
<tr>
<td>BORDER PATROL SECURITY COMPANY LIMITED</td>
<td>23</td>
<td>30-Jun-13</td>
</tr>
<tr>
<td>BUNKER SECURITY &amp; PROTECTION LIMITED</td>
<td>110</td>
<td>31-Jan-13</td>
</tr>
<tr>
<td>BUSINESS RECOVERY SERVICES LIMITED</td>
<td>2</td>
<td>31-Jul-13</td>
</tr>
<tr>
<td>CANNON ARMOURLED LTD.</td>
<td>38</td>
<td>15-Jun-13</td>
</tr>
<tr>
<td>CHAMPION INDUS. EQUIP. &amp; SUPPLIES LTD.</td>
<td>10</td>
<td>31-Mar-13</td>
</tr>
<tr>
<td>CHE SECURITY LIMITED</td>
<td>17</td>
<td>17-Dec-13</td>
</tr>
<tr>
<td>CINEMAX SECURITY COMPANY LIMITED</td>
<td>3</td>
<td>30-Jun-13</td>
</tr>
<tr>
<td>CITY SECURITY COMPANY LIMITED</td>
<td>1</td>
<td>30-Nov-12</td>
</tr>
<tr>
<td>CLASSIC PROTECTION &amp; SECURITY CO. LTD.</td>
<td>22</td>
<td>31-Mar-13</td>
</tr>
<tr>
<td>CMS SUPERIOR PLUS SECURITY CO. LTD.</td>
<td>9</td>
<td>2-Nov-13</td>
</tr>
<tr>
<td>COMBINED FORCE ELITE SECURITY LIMITED</td>
<td>2</td>
<td>30-Oct-12</td>
</tr>
<tr>
<td>COMFORT SECURITY SERVICES LIMITED</td>
<td>1</td>
<td>12-Aug-13</td>
</tr>
<tr>
<td>COREPROTECT SECURITY LIMITED</td>
<td>12</td>
<td>5-Jun-13</td>
</tr>
<tr>
<td>CORPORATE SECURITY &amp; INVEST. SERVS. LTD.</td>
<td>2</td>
<td>6-Nov-13</td>
</tr>
<tr>
<td>CRIME ALERT HI-TEC SECURITY LIMITED</td>
<td>10</td>
<td>28-Feb-13</td>
</tr>
<tr>
<td>CRIMEX CORPORATION LIMITED</td>
<td>2</td>
<td>1-Apr-13</td>
</tr>
<tr>
<td>Company name</td>
<td>Number of guards employed</td>
<td>Expiry date</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------</td>
<td>---------------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>CROSSMAN SECURITY SERVICES LIMITED</td>
<td>9</td>
<td>15-Aug-13</td>
</tr>
<tr>
<td>D &amp; I FRAME SECURITY SERVICES LTD.</td>
<td>3</td>
<td>15-May-13</td>
</tr>
<tr>
<td>D E P SECURITY SERVICES LIMITED</td>
<td>50</td>
<td>15-Nov-12</td>
</tr>
<tr>
<td>DATA-CAP PROCESSING LTD.</td>
<td>12</td>
<td>30-Jun-12</td>
</tr>
<tr>
<td>DEVNEWROK SECURITY LTD.</td>
<td>34</td>
<td>21-Sep-13</td>
</tr>
<tr>
<td>DIER EXECUTIVE SERVICES LIMITED</td>
<td>1</td>
<td>28-Jan-14</td>
</tr>
<tr>
<td>DIGVIEW SECURITY LIMITED</td>
<td>1</td>
<td>27-Jun-13</td>
</tr>
<tr>
<td>DRAGON EYE SECURITY COMPANY LIMITED</td>
<td>1</td>
<td>21-Jan-14</td>
</tr>
<tr>
<td>DURO INVESTIGATION AGENCY LIMITED</td>
<td>1</td>
<td>30-Oct-13</td>
</tr>
<tr>
<td>E.A.P SECURITY SERVICES LIMITED</td>
<td>10</td>
<td>11-Apr-13</td>
</tr>
<tr>
<td>EAGLE SECURITY SERVICES LIMITED</td>
<td>4</td>
<td>21-Oct-12</td>
</tr>
<tr>
<td>EDBAR SECURITY LIMITED</td>
<td>5</td>
<td>31-Jan-14</td>
</tr>
<tr>
<td>ELEPHANT TRUNK SECURITY LIMITED</td>
<td>3</td>
<td>30-Sep-12</td>
</tr>
<tr>
<td>ELITEGUARD LIMITED</td>
<td>49</td>
<td>4-Mar-14</td>
</tr>
<tr>
<td>ELITEGUARD SERVICES LIMITED</td>
<td>4</td>
<td>27-May-13</td>
</tr>
<tr>
<td>EXCEL SECURITY SERVICES LIMITED</td>
<td>44</td>
<td>1-Oct-12</td>
</tr>
<tr>
<td>EXECUTIVE SEC. MGMT. &amp; ADMIN. LIMITED</td>
<td>9</td>
<td>17-Jan-13</td>
</tr>
<tr>
<td>EXPLORE SECURITY SERVICES LIMITED</td>
<td>4</td>
<td>5-Oct-12</td>
</tr>
<tr>
<td>EXPRESS PROTECTION &amp; INVEST. SERVS. LTD.</td>
<td>11</td>
<td>11-Feb-14</td>
</tr>
<tr>
<td>EYE WATCH SECURITY COMPANY LIMITED</td>
<td>1</td>
<td>29-Aug-13</td>
</tr>
<tr>
<td>FACTORIES CORPORATION OF JAMAICA LTD.</td>
<td>5</td>
<td>27-Oct-13</td>
</tr>
<tr>
<td>FAIRVIEW INVESTIGATIONS LIMITED</td>
<td>2</td>
<td>2-Jul-13</td>
</tr>
<tr>
<td>FEARCE SECURITY SERVICE LIMITED</td>
<td>6</td>
<td>26-May-13</td>
</tr>
<tr>
<td>FIERST JAMAICA LIMITED</td>
<td>19</td>
<td>10-Mar-14</td>
</tr>
<tr>
<td>FIRST ALERT SECURITY SERVICES (JA.) LTD</td>
<td>13</td>
<td>4-May-13</td>
</tr>
<tr>
<td>FIRST PREMIER SECURITY</td>
<td>4</td>
<td>14-Jun-13</td>
</tr>
<tr>
<td>FISCAL SERVICES LIMITED</td>
<td>8</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>FOCUS INVESTIGATIONS LIMITED</td>
<td>3</td>
<td>30-Nov-13</td>
</tr>
<tr>
<td>FORCE TECH PROTECTION &amp; SECURITY LIMITED</td>
<td>4</td>
<td>9-Jun-13</td>
</tr>
<tr>
<td>FORMIDABLE SECURITY COMPANY LIMITED</td>
<td>1</td>
<td>1-Aug-13</td>
</tr>
<tr>
<td>FULL GUARD SECURITY COMPANY LIMITED</td>
<td>3</td>
<td>11-Apr-13</td>
</tr>
<tr>
<td>G MAX FORCE SECURITY COMPANY LIMITED</td>
<td>1</td>
<td>20-Jan-14</td>
</tr>
<tr>
<td>G4S JAMAICA LIMITED</td>
<td>116</td>
<td>30-Jun-13</td>
</tr>
<tr>
<td>GENERAL SERVICES (SECURITY) (2001) LTD.</td>
<td>1</td>
<td>31-Mar-13</td>
</tr>
<tr>
<td>GEOKEL SERVICES LIMITED</td>
<td>17</td>
<td>17-Feb-14</td>
</tr>
<tr>
<td>GOLDEN SHORE RESORT LIMITED</td>
<td>2</td>
<td>31-Mar-13</td>
</tr>
<tr>
<td>GUARDSMAN ALARMS</td>
<td>3</td>
<td>31-Jul-13</td>
</tr>
<tr>
<td>GUARDSMAN ARMOURDED LIMITED</td>
<td>4</td>
<td>15-Jul-13</td>
</tr>
<tr>
<td>GUARDSMAN GROUP (HRM) LIMITED</td>
<td>24</td>
<td>22-Feb-14</td>
</tr>
<tr>
<td>GUARDSMAN LIMITED</td>
<td>2960</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>HARD TARGET SEC. &amp; INVESTIGATION CO. LTD.</td>
<td>15</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>HAWKEYE ELECTRONIC SECURITY LIMITED</td>
<td>65</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>HIGH VOLTAGE SECURITY LIMITED</td>
<td>1</td>
<td>9-Dec-13</td>
</tr>
<tr>
<td>HOMELAND SAFETY &amp; PROTECTION CO. LTD.</td>
<td>2</td>
<td>20-Dec-13</td>
</tr>
<tr>
<td>ICE SECURITY SERVICES LIMITED</td>
<td>2</td>
<td>9-Jan-13</td>
</tr>
<tr>
<td>IDEAL GUARDS LIMITED</td>
<td>2</td>
<td>25-May-13</td>
</tr>
<tr>
<td>IMMACULATE PROTECTION &amp; ACCESSORIES LTD.</td>
<td>14</td>
<td>15-Dec-12</td>
</tr>
<tr>
<td>INHOUSE HOTELS LIMITED</td>
<td>19</td>
<td>31-Jan-14</td>
</tr>
<tr>
<td>INNOVATIVE SEC. TECH. &amp; ALARMS (JA) LTD.</td>
<td>1</td>
<td>30-Sep-12</td>
</tr>
<tr>
<td>INTEGRATED SECURITY SYSTEMS (2001) LTD.</td>
<td>67</td>
<td>27-Feb-14</td>
</tr>
<tr>
<td>INTEL SECURITY LIMITED</td>
<td>1</td>
<td>23-Apr-13</td>
</tr>
<tr>
<td>J ISLAND TECHNOLOGY &amp; SEC. SERVS. LTD.</td>
<td>1</td>
<td>6-Dec-13</td>
</tr>
<tr>
<td>J. WRAY &amp; NEPHEW LIMITED</td>
<td>8</td>
<td>31-Jul-13</td>
</tr>
<tr>
<td>Company name</td>
<td>Number of guards employed</td>
<td>Expiry date</td>
</tr>
<tr>
<td>------------------------------------------------------------------</td>
<td>---------------------------</td>
<td>---------------</td>
</tr>
<tr>
<td>JACKIE'S ON THE REEF</td>
<td>1</td>
<td>3-May-14</td>
</tr>
<tr>
<td>JAKES HOLDINGS LIMITED</td>
<td>14</td>
<td>14-Apr-13</td>
</tr>
<tr>
<td>JAMACTION SECURITY &amp; PROTECTION CO. LTD.</td>
<td>26</td>
<td>22-Feb-14</td>
</tr>
<tr>
<td>JAMAICA BODY GUARD &amp; SECURITY CO. LTD.</td>
<td>12</td>
<td>15-Jun-13</td>
</tr>
<tr>
<td>JAMAICA BROILERS GROUP LIMITED</td>
<td>8</td>
<td>27-Oct-13</td>
</tr>
<tr>
<td>JOB SOLUTION JAMAICA LIMITED</td>
<td>12</td>
<td>1-Feb-13</td>
</tr>
<tr>
<td>JR SECURITY COMPANY LIMITED</td>
<td>18</td>
<td>14-May-13</td>
</tr>
<tr>
<td>KARATE AND SECURITY SERVICES LTD.</td>
<td>15</td>
<td>2-Jul-13</td>
</tr>
<tr>
<td>KEYES PROTECTION &amp; SECURITY LIMITED</td>
<td>2</td>
<td>22-Aug-13</td>
</tr>
<tr>
<td>KINGALARM SERVICES LIMITED</td>
<td>259</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>KNIGHTSMAN LIMITED</td>
<td>115</td>
<td>30-Apr-13</td>
</tr>
<tr>
<td>LAWMAN COMPANY LIMITED</td>
<td>14</td>
<td>13-Dec-12</td>
</tr>
<tr>
<td>LIGHTNING FORCE SECURITY LIMITED</td>
<td>26</td>
<td>13-Aug-13</td>
</tr>
<tr>
<td>MACKAY SEC. &amp; INVESTIGATIVE SERVS. LTD.</td>
<td>300</td>
<td>31-Mar-13</td>
</tr>
<tr>
<td>MADHU-MOHAN LIMITED</td>
<td>1</td>
<td>16-Apr-13</td>
</tr>
<tr>
<td>MAJESTIC SECURITY COMPANY LIMITED</td>
<td>8</td>
<td>1-Nov-13</td>
</tr>
<tr>
<td>MARKSMAN LIMITED</td>
<td>2574</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>MAXIMUM FORCE COMPANY LIMITED</td>
<td>1</td>
<td>31-Jan-13</td>
</tr>
<tr>
<td>MCKAY SECURITY &amp; INDUSTRIAL SERVS. LTD.</td>
<td>63</td>
<td>27-Apr-13</td>
</tr>
<tr>
<td>MELAN SECURITY SERVICES LIMITED</td>
<td>35</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>METRO LOSS PREV. &amp; SEC. SERVS. LTD.</td>
<td>44</td>
<td>28-Feb-13</td>
</tr>
<tr>
<td>METRODADE PROTECTION SECURITY CO. LTD.</td>
<td>109</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>MICA SECURITY COMPANY LIMITED</td>
<td>122</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>MILEX SECURITY SERVICES LTD.</td>
<td>317</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>MILLIUM SECURITIY LIMITED</td>
<td>81</td>
<td>31-Oct-12</td>
</tr>
<tr>
<td>MODERN INVESTIGATION &amp; SECURITY LIMITED</td>
<td>85</td>
<td>30-Jun-13</td>
</tr>
<tr>
<td>MONARCH SECURITY COMPANY LTD.</td>
<td>11</td>
<td>20-Dec-13</td>
</tr>
<tr>
<td>MZ HOLDINGS LIMITED</td>
<td>1</td>
<td>20-Jan-14</td>
</tr>
<tr>
<td>NARCOTIC CANINE SERVICES LIMITED</td>
<td>3</td>
<td>28-Oct-12</td>
</tr>
<tr>
<td>NAS PROTECTION LIMITED</td>
<td>3</td>
<td>11-Nov-12</td>
</tr>
<tr>
<td>NEGRIL'S IDLE AWHILE LIMITED</td>
<td>4</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>NORMAL SECURITY SERVICES LIMITED</td>
<td>14</td>
<td>30-Jun-13</td>
</tr>
<tr>
<td>OVERTON PLAZA LIMITED</td>
<td>4</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>PARNELL'S SECURITY SOLUTIONS LIMITED</td>
<td>1</td>
<td>5-Dec-13</td>
</tr>
<tr>
<td>PATRIOT SEC. SERVS. (SUCCESSORS) LTD.</td>
<td>30</td>
<td>31-Jan-14</td>
</tr>
<tr>
<td>PETROLEUM CORPORATION OF JAMAICA</td>
<td>17</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>PLATINUM SECURITY SERVICES LIMITED</td>
<td>2</td>
<td>6-Apr-13</td>
</tr>
<tr>
<td>POINT GUARD SECURITY CO. LTD.</td>
<td>66</td>
<td>30-Nov-13</td>
</tr>
<tr>
<td>PORT MARLY LIMITED</td>
<td>26</td>
<td>31-Jul-13</td>
</tr>
<tr>
<td>POWER PAC SECURITY SERVICES LIMITED</td>
<td>12</td>
<td>1-Feb-13</td>
</tr>
<tr>
<td>PREMIER SECURITY COMPANY LIMITED</td>
<td>54</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>PRIORITY PROTECTION LTD.</td>
<td>5</td>
<td>30-Jan-13</td>
</tr>
<tr>
<td>PRO PROTECTOR LIMITED</td>
<td>1</td>
<td>8-Feb-13</td>
</tr>
<tr>
<td>PROLIFIC SECURITY COMPANY LIMITED</td>
<td>4</td>
<td>16-Apr-13</td>
</tr>
<tr>
<td>PROTECTION AND SECURITY (2011) LTD.</td>
<td>194</td>
<td>28-Jul-13</td>
</tr>
<tr>
<td>PROTECTION ONE SECURITY LIMITED</td>
<td>17</td>
<td>20-May-13</td>
</tr>
<tr>
<td>QUEST DLC LIMITED</td>
<td>7</td>
<td>6-Dec-12</td>
</tr>
<tr>
<td>QUEST SECURITY SERVICES LIMITED</td>
<td>558</td>
<td>30-Sep-13</td>
</tr>
<tr>
<td>RANGER PROT. &amp; SECURITY CO. LTD.</td>
<td>1538</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>RECREATION PATHWAYS JAMAICA LIMITED</td>
<td>8</td>
<td>15-Dec-13</td>
</tr>
<tr>
<td>RIU JAMACOTEL LIMITED</td>
<td>20</td>
<td>21-Mar-13</td>
</tr>
<tr>
<td>RNAR ENTERPRISES</td>
<td>1</td>
<td>14-Dec-13</td>
</tr>
<tr>
<td>ROSE HALL (DEVELOPMENT) LIMITED</td>
<td>4</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>Company name</td>
<td>Number of guards employed</td>
<td>Expiry date</td>
</tr>
<tr>
<td>--------------------------------------------------------</td>
<td>---------------------------</td>
<td>------------------</td>
</tr>
<tr>
<td>ROSE HALL ASSOCIATES LTD. PARTNERSHIP</td>
<td>38</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>SAL SECURITY SERVICES</td>
<td>237</td>
<td>1-Feb-13</td>
</tr>
<tr>
<td>SCORPIO SECURITY SERVICE COMPANY LTD.</td>
<td>6</td>
<td>31-Aug-13</td>
</tr>
<tr>
<td>SEC. ADVISORY &amp; MANAGEMENT SERVS. LTD.</td>
<td>51</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>SECRETS RESORTS MONTEGO BAY</td>
<td>4</td>
<td>7-Mar-13</td>
</tr>
<tr>
<td>SECURE SECURITY LIMITED</td>
<td>97</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>SUREWORLD PROTECTIVE SERVS. CORP. LTD.</td>
<td>34</td>
<td>21-May-13</td>
</tr>
<tr>
<td>SECURIPRO LTD</td>
<td>393</td>
<td>15-May-13</td>
</tr>
<tr>
<td>SECURITY ADMINISTRATORS LIMITED</td>
<td>76</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>SECURITY ALLIANCE SERVICES (SAS) LIMITED</td>
<td>86</td>
<td>7-Jun-13</td>
</tr>
<tr>
<td>SECURITY INNOVATIONS LIMITED</td>
<td>134</td>
<td>30-Nov-12</td>
</tr>
<tr>
<td>SENTRY SERVICES SEC. CO. LTD.</td>
<td>537</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>SHALK ELECTRONIC SECURITY LIMITED</td>
<td>74</td>
<td>30-Nov-13</td>
</tr>
<tr>
<td>SHIELDS CRIME &amp; SECURITY CONSULTANTS LTD</td>
<td>2</td>
<td>19-Dec-13</td>
</tr>
<tr>
<td>SILVER STAR PROTECTION LIMITED</td>
<td>13</td>
<td>15-Apr-13</td>
</tr>
<tr>
<td>SITEWATCH ELECTRONIC SECURITY</td>
<td>2</td>
<td>19-May-13</td>
</tr>
<tr>
<td>SNIPER SECURITY SERVICE LIMITED</td>
<td>6</td>
<td>2-Sep-13</td>
</tr>
<tr>
<td>SPARTACUS SEC. &amp; INVESTIGATIONS CO. LTD.</td>
<td>10</td>
<td>7-Mar-14</td>
</tr>
<tr>
<td>SPECIAL TEAM SECURITY SERVICES LIMITED</td>
<td>1</td>
<td>23-Feb-13</td>
</tr>
<tr>
<td>SPECIAL WEAPON AND TECHNOLOGY CO. LTD.</td>
<td>1</td>
<td>27-Sep-12</td>
</tr>
<tr>
<td>SPECIAL-FORCES DRAGNET INV. &amp; SEC. LTD.</td>
<td>20</td>
<td>4-Dec-13</td>
</tr>
<tr>
<td>STAR ONE PROTECTION COMPANY LIMITED</td>
<td>5</td>
<td>26-May-13</td>
</tr>
<tr>
<td>STEEL SECURITY LIMITED</td>
<td>1</td>
<td>21-Feb-14</td>
</tr>
<tr>
<td>SUNCOAST INVESTMENTS LIMITED</td>
<td>4</td>
<td>30-Apr-14</td>
</tr>
<tr>
<td>SUNSET BEACH &amp; SPA RESORT HOTELS LTD.</td>
<td>48</td>
<td>15-Oct-13</td>
</tr>
<tr>
<td>SUPER FORCE SECURITY LIMITED</td>
<td>6</td>
<td>15-Dec-13</td>
</tr>
<tr>
<td>SWAT ELITE CLOSE PROTECTION UNIT LIMITED</td>
<td>1</td>
<td>13-Nov-13</td>
</tr>
<tr>
<td>SWAT SECURITY LIMITED</td>
<td>2</td>
<td>4-Jul-13</td>
</tr>
<tr>
<td>T.A.S INVESTMENTS LTD. / ALHAMBRA INN</td>
<td>2</td>
<td>30-Jun-13</td>
</tr>
<tr>
<td>T.A.P. SECURITY LIMITED</td>
<td>4</td>
<td>28-Feb-13</td>
</tr>
<tr>
<td>TACTICAL TRAINING &amp; SECURITY LTD.</td>
<td>5</td>
<td>30-Nov-13</td>
</tr>
<tr>
<td>TASK FORCE SECURITY COMPANY LIMITED</td>
<td>51</td>
<td>27-Oct-12</td>
</tr>
<tr>
<td>TECHNOLOGY PLUS COMPANY LIMITED</td>
<td>13</td>
<td>30-Jun-13</td>
</tr>
<tr>
<td>THE JUDY HOUSE</td>
<td>1</td>
<td>4-Apr-13</td>
</tr>
<tr>
<td>THE NEW AUGUSTUS SECURITY COMPANY LTD.</td>
<td>7</td>
<td>28-Feb-13</td>
</tr>
<tr>
<td>THE RITZ-CARLTON HOTEL CO. OF JA. LTD.</td>
<td>30</td>
<td>30-Jun-13</td>
</tr>
<tr>
<td>THE SHIPPING ASSOCIATION OF JAMAICA</td>
<td>11</td>
<td>30-Jun-13</td>
</tr>
<tr>
<td>TISCO INVESTIGATION SERVICES CO. LTD.</td>
<td>1</td>
<td>27-Jan-13</td>
</tr>
<tr>
<td>TOMLOCK SECURITY SERVICES LIMITED</td>
<td>12</td>
<td>30-Jun-13</td>
</tr>
<tr>
<td>TOP CLASS SECURITY COMPANY LIMITED</td>
<td>27</td>
<td>31-Oct-12</td>
</tr>
<tr>
<td>TRIPLE X SECURITY COMPANY LIMITED</td>
<td>2</td>
<td>14-Mar-14</td>
</tr>
<tr>
<td>ULTRA PROTECTION SERVICES LIMITED</td>
<td>0</td>
<td>31-Oct-12</td>
</tr>
<tr>
<td>UNIQUE EXECUTIVE SOLUTIONS LIMITED</td>
<td>1</td>
<td>17-Sep-13</td>
</tr>
<tr>
<td>UNIQUE SECURITY LIMITED</td>
<td>43</td>
<td>31-Oct-12</td>
</tr>
<tr>
<td>URBAN DEVELOPMENT CORPORATION</td>
<td>36</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>V.I.P. SERVICES &amp; TRAINING INST. LTD.</td>
<td>3</td>
<td>12-Sep-13</td>
</tr>
<tr>
<td>VANGUARD ALARMS LIMITED</td>
<td>1</td>
<td>30-Jun-13</td>
</tr>
<tr>
<td>VANGUARD SECURITY LIMITED</td>
<td>545</td>
<td>31-Oct-13</td>
</tr>
<tr>
<td>VICTORY SYSTEMS SEC. SERVS. (JA.) LTD.</td>
<td>2</td>
<td>12-Dec-13</td>
</tr>
<tr>
<td>VILLA ELLEGANCE</td>
<td>3</td>
<td>26-Feb-13</td>
</tr>
<tr>
<td>VINEL CENTRAL INVEST &amp; SEC. CONSUL. LTD.</td>
<td>1</td>
<td>31-Mar-13</td>
</tr>
<tr>
<td>VK &amp; K SECURITY COMPANY LIMITED</td>
<td>6</td>
<td>31-Mar-13</td>
</tr>
<tr>
<td>WARMsville INVEST. SEC. &amp; ENQ. CONSULT.</td>
<td>3</td>
<td>1-Mar-14</td>
</tr>
<tr>
<td>Company name</td>
<td>Number of guards employed</td>
<td>Expiry date</td>
</tr>
<tr>
<td>--------------------------------------------</td>
<td>---------------------------</td>
<td>--------------</td>
</tr>
<tr>
<td>WATCHFUL EYES PROTECTION SERVICES LTD.</td>
<td>1</td>
<td>15-Nov-13</td>
</tr>
<tr>
<td>WELCOME PROTECTIVE SERVICES LIMITED</td>
<td>2</td>
<td>21-Jan-14</td>
</tr>
<tr>
<td>WILD LEOPARD SECURITY COMPANY LIMITED</td>
<td>8</td>
<td>19-Sep-13</td>
</tr>
<tr>
<td>WINDALCO</td>
<td>15</td>
<td>30-Sep-13</td>
</tr>
<tr>
<td>WPC GROUP OF COMPANIES LIMITED</td>
<td>2</td>
<td>29-Aug-13</td>
</tr>
</tbody>
</table>

Total # of companies: 212

Total guards: 16,335
### Appendix 2: Security contractors for the Jamaica government, 2002-2011

<table>
<thead>
<tr>
<th>Contractor name</th>
<th>2002</th>
<th>2003</th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
<th>2009</th>
<th>2010</th>
<th>2011</th>
<th>Not licensed In 2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>EHC Industries Limited</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>NL</td>
</tr>
<tr>
<td>Marksman Limited</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ranger Protection and Security Services Limited</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Ranger Security Company</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>United Protection Limited</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sentinel Stanguard and Investigation Limited</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>NL</td>
</tr>
<tr>
<td>Vanguard Security Limited</td>
<td>X</td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Guardsman Limited</td>
<td>X</td>
<td></td>
<td>X</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Guardsman Armoured Limited</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Atlas Protection Limited</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Atlas Armoured Services Limited</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Atlas Security</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mica Security Limited</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hawkeye Electronic Security Limited (in USD)</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Alpha Security Services Limited</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Brigade Security Services Limited</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>NL</td>
</tr>
<tr>
<td>Corporate Logistics Limited</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>NL</td>
</tr>
<tr>
<td>Crime Prevention Armoured Services Limited</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>NL</td>
</tr>
<tr>
<td>Crime Prevention Security Limited</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Milex Security Services Limited</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Quest Security Services Limited</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Modern Investigations and Security Company Limited</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Bunker Security and Protection Limited</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Intrepid Security Services</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>NL</td>
</tr>
<tr>
<td>DLC International Security Limited</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>NL</td>
</tr>
<tr>
<td>Securicor Jamaica Limited</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>NL</td>
</tr>
<tr>
<td>Technology Plus Company Limited</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>G4S Security Services Limited</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Company Name</td>
<td>Awarded in</td>
<td>USD</td>
<td>NL</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>--------------------------------------------------------</td>
<td>------------</td>
<td>-----</td>
<td>----</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Allied Protection Limited</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Smiths Detention (in USD)</td>
<td>X</td>
<td>X</td>
<td>NL</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SAIC (in USD)</td>
<td>X</td>
<td>X</td>
<td>NL</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Intouch Construction and Security Limited</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Protection and Security Limited</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Protection Security Company Limited</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bulls Eye Security Limited</td>
<td>X</td>
<td>X</td>
<td>NL</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rapiscan Systems (in USD)</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Security Innovations Limited</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Primeguard Loss Prevention Limited</td>
<td></td>
<td>X</td>
<td>NL</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Security Administrators Specialist Services Limited</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shalk Electronic Security Limited</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sentry Services Security Company Limited</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Security Advisory and Management Services</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>King Alarm Systems</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Knightsman Limited</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Acid Security Services Limited</td>
<td></td>
<td></td>
<td>NL</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ports Security Corps Limited</td>
<td>X</td>
<td></td>
<td>NL</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

"X" indicates one or more contracts awarded by a government agency to the company in that year. NL = not licensed.
Notes

1. Interviews with industry and government officials, October 2012.

2. At the time of writing, J$1000 was equivalent to about US$10.

3. The compilation produced a “master list” of the names, addresses, and phone numbers of 273 PSC companies, of which 208 were registered with the PSRA. This list suggests that almost one-quarter of listed PSCs are unregistered.


5. Ibid.

6. The PSRA website also reports the number of guards employed by security companies registered with the Authority. Since not all registered guards are employed by registered companies, the company totals are less than the total number of registered guards. For example, in March 2013 the PSRA reported the total number of registered guards as 19,111. The total number of guards reported employed by registered companies was 16,335. PSRA officials explain that independent guard registration is permitted so that guards may offer services to schools and other organizations that hire them directly.

7. Communication with PSRA official, June 2013.

8. Only NCC-reported contracts of value greater than J$10-million were used to compile the table.


References


Conclusion
John Siebert

General introduction

The need for primary research and policy direction on regulating private security companies (PSCs) in the Caribbean was appropriately summed up in a recent document produced for CARICOM by its Implementation Agency for Crime and Security: Crime and Security Strategy 2013 (IMPACS 2013):

Private Security Industry

1.38. The private security industry has grown rapidly over the last decade in CARICOM, and private security employees may now outnumber their counterparts in law enforcement in many Member States. Individuals working within the private security industry make a significant contribution to the everyday safety and security of the Region. However, in the absence of effective legal or regulatory structures to ensure proper vetting, the activities of private security companies raise issues of legality, legitimacy and accountability in the sphere of security policy. The integration of the private security industry into any security plan is therefore critical in achieving a safe and secure environment for CARICOM, and has an important role to play in reducing crime in the Community. (p. 19)

The findings of the field research that are the heart of the three case studies for this project affirmed the general conclusions in the IMPACS report: namely, the important role of PSCs in the overall security picture in the Caribbean and the inadequacy of their regulation.

The discussion of the case studies at the project policy roundtable held at The University of the West Indies at St. Augustine, Trinidad and Tobago, 17–18 June 2013 provided informed commentary from public officials involved in PSC regulation and PSC industry representatives on the findings of the case studies and the recommendations. The limitations of the field research are acknowledged in the next section. These limitations also point to potential future work for scholars and policy practitioners to better understand the role and contribution of PSCs to the broader security situation in the Caribbean. The summary findings of the research and the policy roundtable set the stage for region wide recommendations provided at the end of this chapter.

Limitations to the research

Elite interviews and survey questionnaires used in this research provided new data to allow a detailed examination of PSCs in the three case-study countries. Interview responses answered questions on the establishment and ownership of the industry; services provided; purpose and capacity; personnel training and professionalism; the use and control of firearms; existing, proposed, and desired regulatory changes; and relationships between security actors and key stakeholders.

A wider selection of country case studies would expand the findings and provide a broader set of data on which to base practical recommendations. The research was originally designed to include four countries (CARICOM member Guyana was to be the fourth case), but financial and logistical limitations made this impossible.

Hesitancy by PSCs to participate in the research and to disclose certain types of information was observed in all three case-study countries. Some stakeholders were reluctant to provide information related to revenue, employees, and firearms. This also may have been the cause of low return rates of written surveys, which may cast doubt on the representative nature of some of the statistics collected.

With two exceptions all PSCs contacted by researchers were contract security companies rather than proprietary security providers. As a result, the research findings are limited to contract services. The potential impact and problems of proprietary service providers are, in effect, not covered. Balancing this observation is the fact that neither the secondary literature nor media reports indicate particular or unique problems with proprietary private security operations.
While expansion of the PSC industry in the Caribbean and the rise in violent crime rates are roughly concurrent, conclusions about the relationship between the two should err on the side of caution. In-depth analysis of economic growth in the subregion or in sectors such as tourism or resource extraction might provide corresponding factors or even other causative factors for growth of PSCs. Other factors may include lack of trust by commercial entities and individuals in policing services or the broader judicial or political systems. A general trend in governance to privatize public service delivery may be a factor. Further analysis may or may not link global growth in the PSC industry to its growth in the subregion—including in states in which crime rates are declining.

The increasing technical sophistication of some PSCs, noted particularly in Trinidad and Tobago as a response to international standards for oil and gas extraction, is creating important changes in the private security industry. Those PSCs are looking to functional or industry-specific international standards that far exceed current or planned national PSC regulatory standards. The case studies note this development, but do not explore its potential role in improving national regulatory regimes.

Finally, little previous empirical research at the country level has been conducted and published on PSCs in the Caribbean. Thus there are few published sources against which to compare or test the data and conclusions drawn from these case studies. The current lack of PSC-specific regulation, particularly in St. Lucia and Trinidad and Tobago, also left the researchers reliant on the limited data disclosed by the private security sector.

The context: Armed violence in the Caribbean

As anticipated, there was no evidence in the case study research that PSCs provided military-related services. With the possible exception of Haiti (see Burt 2012), the Caribbean is not considered a war zone—although this might depend on how long-term internal conflicts are characterized. But while the rest of the Caribbean is not currently affected by overt political violence, highly concentrated pockets in some urban areas suffer inordinately from organized or gang-related crime and individual opportunistic crime and predation.

The Stockholm International Peace Research Institute (2010, p. 55) grapples with these realities in its 2010 Yearbook:

Such situations do not meet the classic definition of armed conflict for several reasons, even if they account for an equivalent number of fatalities. Perhaps the most important is that the definition of an armed conflict requires that the fighting be contesting a declared incompatibility over government or political control of territory. Most organized criminal groups engaged in fighting state security forces do not claim to be contesting such an incompatibility.

Research reported in the Global Burden of Armed Violence (Geneva Declaration 2011) clearly shows that the Caribbean subregion and its immediate neighbourhood in Central and South America are hotspots for armed violence. Of the 14 countries in the world that sustained annual violent death rates of more than 30 per 100,000 population in the period 2004–2009, seven are in the Latin America and Caribbean region, including case-study country Jamaica (59/100,00) and fellow CARICOM member Belize (32). The others are El Salvador (63), Honduras (52), Colombia (49), Venezuela (45), and Guatemala (44). Trinidad and Tobago recorded annual violent death rates above 30 per 100,000 in some recent years, but this level of violence decreased in 2011 and 2012.

Localized concentrations of armed violence in larger urban settings have elevated homicide rates. The subregion’s overall homicide rate of 18.1 per 100,000 inhabitants is more than double the world average of 6.9 (UNODC 2011). More than 70 per cent of homicides are committed with guns (Richards 2009). A complex interplay of factors creates a landscape of insecurity. These include illicit trafficking of guns and drugs, poverty, social exclusion, inequality, weakened family structures, collusion between organized crime and corrupt officials, and poor governance (UNODC 2011, pp. 10–12). Evidence from the three case-study countries indicates that the growth of the PSC industry in the Caribbean has taken place in this context of rising armed violence, but, as has been noted, high crime rates and the perception of high crime rates are not the only (or necessarily causative) factors.
Surprisingly, the *Global Burden of Armed Violence* found no clear-cut relationship between the prevalence of firearms and deaths by armed violence, but where there are higher homicide rates, the percentage of homicides caused by firearms increases. This is particularly true of the Caribbean. In Trinidad and Tobago, for example, the percentage of homicides using firearms rose from 54 to 74 per cent during the period 2001–2006. During the same period total homicides increased 9 per cent (UNODC and World Bank 2007, p. 129).

Of the approximately 526,000 victims who have died violently worldwide each year since 2005, 66,000 have been women (Geneva Declaration 2011). Young men between 15 and 30 years of age are the primary perpetrators and victims of armed violence. The tragedy of the loss of life through armed violence is compounded by the fact that endemic violence hinders socioeconomic development.

Policy roundtable participants pointed to the inherent security vulnerabilities of the Caribbean. Archipelagos provide unique opportunities for law breakers to hide or transport illicit goods. As one person stated, “Pirates have always found the Caribbean good.” Shifting patterns of illegal drug transportation and distribution and the accompanying illicit use of firearms are among the primary explanations for high concentrations of violent crime in the Caribbean.

**Summary research findings**

PSCs make a positive contribution to the economies of the Caribbean islands by protecting people and property. An example provided at the policy roundtable was that branches of financial institutions are required by law to employ an armed guard to assist in the daily opening by carrying out a basic search to ensure that a break-in has not occurred and that unauthorized personnel have not entered. There are not enough police officers to perform such duties; they are carried out by PSC personnel.

In 2010 in Kingston, Jamaica police and military services were concentrated on Tivoli Gardens in an ultimately successful attempt to arrest gang leader and drug dealer Christopher “Dudus” Coke (as demanded by the United States). Clashes with Coke’s supporters resulted in the shooting deaths of more than 70 people (Schwartz 2011). During this crisis PSCs essentially provided security elsewhere in Jamaica and kept economic life moving by safely transferring cash and providing other security services.

PSCs provide a significant number of jobs, particularly for entry-level workers, including many women. But there are indications that internal advancement of women may be limited in the private security industry. Other employment issues, related to wages and benefits and working conditions, also require attention.

The dramatic growth of the PSC industry in the Caribbean over the past two decades may be levelling off. The economic recession that began in 2008 is one possible factor. Technical innovation that permits greater use of cheaper electronic surveillance rather than onsite personnel is another.

PSCs are an important part of the security landscape. However, our research uncovered no evidence of a direct impact by PSCs on violent crime rates. There may be radiating security benefits to neighbourhoods close to sites where PSCs provide security. Increased feelings of safety because of the presence of PSC personnel were also reported; perceptions of crime and security do have an important impact on the population and government security policy. Further research along different lines than those pursued for this project would be needed to confirm that there is more than anecdotal evidence that PSCs contribute to perceptions of higher security and confidence.

The negative impact of the possession and use of guns by PSCs appears to be a latent problem, with only anecdotal indications of misuse (renting out, leakage, etc.). Enhanced gun registration and enforcement procedures for PSCs in each country seem the best way to curb this real or potential problem.

The industry in the Caribbean is largely locally owned and operated. Exceptions are the multinational G4S and the Jamaican-owned Guardsman, which operate throughout the subregion. The current high
level of local ownership may be challenged by European private security firms enabled by a free trade agreement between the European Union and CARICOM. At the same time, regionally operating companies could take advantage of the movement toward a CARICOM Single Market and Economy to compete with locally owned companies throughout the subregion.

PSCs pose latent or potential threats to public order if they align with or are controlled by gangs and organized crime. In the recent past there have been alleged links in Jamaica and perhaps some other Caribbean countries between criminal gangs and political parties. Media reports indicate that Jamaican gangster Dudus Coke was a major shareholder of Bulls Eye Security Services Limited (Reid 2010). Such criminal enterprises might also have political connections. These threats are worth keeping in mind when bolstering PSC regulatory regimes to maximize transparency of ownership and direction, as well as oversight of guns and other weapons in PSC possession. Safeguards must be in place with respect to PSCs, based on the principles of transparency and accountability to democratically controlled processes of oversight.

Other concerns arise if PSCs are used by governing authorities or anti-government factions to defend or defeat a government. These scenarios seem farfetched in the current political environment, but are not unrealistic given the recent history of some Caribbean countries. Threats to the political order from disaffected parties created crises in Trinidad (1990) and Grenada (1983). Armed personnel from PSCs have the makings of paramilitary troops in situations of political uncertainty.

Legislative and regulatory frameworks and oversight bodies must be created or updated to effectively control the growing and evolving private security industry, but must also be tailored to fit the particular circumstances of each Caribbean nation. For example, the precepted officer in Trinidad and Tobago has no direct parallel in other Caribbean countries. With quasi-policing powers, precepted officers provide substantial capacity to the law enforcement regime. This arrangement will have to be significantly amended to conform to standard PSC regulations. A unique transition period would be required if the Government of Trinidad and Tobago chooses to eliminate precepted officers in anticipated legislation. Budgeting for much larger expenditures on police services would be needed to maintain security in the absence of precepted officers.

Informal networking by CARICOM member states to exchange information on practical implementation will likely prove more effective in raising PSC operational standards and compliance than will attempts to formalize a regulatory framework and oversight body for the entire subregion. The development of CARICOM model legislation could potentially provide a resource to some CARICOM members, but it may not be worth the time and trouble if each state needs to then substantially customize the models.

The private security industry has much to gain in public stature and legitimacy by actively participating in the development of regulatory regimes that encourage higher standards for staff training and discipline. A tension exists, however, between active industry participation in regulatory regimes and regulatory capture (see Burt 2012). The regulatory apparatus must be at arm's length from the industry to oversee and adequately discipline PSCs and guard against conflicts of interest.

Private security representatives attending the June 2013 policy roundtable responded to the notion of regulatory capture by the industry with concerns about the potential dangers of state capture of the industry, whereby governments exercise too much control and market mechanisms no longer function. Good legislation and regulations are needed to allow the market to operate efficiently and effectively within parameters that safeguard the public good.

Commercial interests such as banking and insurance companies may provide key incentives for engagement of PSCs and proper oversight of the private security industry. In St. Lucia there is evidence that the use of security services is encouraged by reduced insurance premiums when PSCs are engaged. Some franchise businesses are required by their franchisors to use PSC services. Such commercial drivers could create incentives for countries to upgrade PSC regulatory regimes and implement them more effectively.
Other potential incentives to accelerate PSC regulatory reform include major events and export growth. It was noted several times at the policy roundtable that the Cricket World Cup hosted by the Caribbean in 2007 spurred a great deal of subregional cooperation on security, including initiatives to regulate the private security industry more closely in some countries to meet international standards and expectations. Unfortunately, with the successful conclusion of the Cricket World Cup, momentum for regulatory reform of the PSC industry seems to have stalled in some countries, including St. Lucia. Adherence by PSCs to internationally recognized industry standards creates a potential stepping stone to greater export of security services within the subregion and beyond.

The industry is segmented into firms that provide increasingly high-end services and those that provide more basic services such as personnel for onsite guarding. The pressure to strengthen regulatory regimes for the higher-end firms may result in marginalizing or driving the smaller, more basic firms to informal or unregistered status to avoid the high costs of compliance. This trend may be more apparent in the richer or larger states such as Trinidad and Tobago, Jamaica, and Barbados. Clearly this heterogeneous industry has conflicting interests in improving regulatory regimes, with the more sophisticated firms generally supporting higher standards and lower-cost PSCs preferring the status quo.

Although PSCs have a highly visible presence in the Caribbean and are generally governed by some legislation and regulation, their extensive role in the security architecture of the subregion does not appear to be systematically considered or explicitly articulated in the broader security frameworks of the countries studied. Jamaica was cited at the policy roundtable as an example of a country in which the most recent national security strategy did not mention the private security industry, although previous strategies had.

Recommendations for the CARICOM subregion

**National regulatory regimes**

**RECOMMENDATION 1**
All CARICOM members should establish national legislation and related regulations, standards, and oversight and monitoring bodies to regulate the private security industry. These national regulatory regimes should reflect common principles among CARICOM members and emerging international standards for PSCs.

**COMMENTS**
Since many Caribbean countries are small, lack resources, and are close to neighbouring states, outside observers might be tempted to encourage economizing through cross-Caribbean harmonization of legislative and oversight bodies for the private security industry. This temptation should be resisted. Unique circumstances in each country and the history of the regulatory regime for the private security industry in each jurisdiction would necessitate too many exceptions and cancel the theoretical gains to be had from a template for the subregion. PSC regulatory regimes, therefore, should be tailored at the national level to match specific security needs with the resources and political processes of each Caribbean country.

At the same time, policy roundtable participants argued that some common framework or standards should be on the CARICOM IMPACS security agenda. The increasingly free movement of peoples in the CARICOM subregion makes advantages for employee security credentials that are recognized across the region. Peer evaluation of standards and credentialing from one country to the next would be advantageous. This would have its application in training programs recognized across jurisdictions.

Peer-to-peer relationships across national jurisdictions could provide efficiencies and incentives for further professionalization of PSC regulatory regimes and delivery of services. As indicated in recommendations for the Jamaica case study, Jamaica regulatory leadership and experience could be shared and adapted for different national circumstances.
Other factors should be borne in mind when constructing or reforming PSC regulatory regimes. Credible public security institutions, starting with policing, are foundational to the proper oversight of PSCs. If they are not in place then security sector reform is job #1, with PSC regulation integrated into that process.

Formal institutional links between PSCs and government security departments and agencies, particularly the police, can be lacking or are haphazard. National PSC regulatory regimes should contain explicit guidelines and mechanisms to connect PSCs to public security bodies, including the police. PSC personnel deal with the public in their day-to-day operations and will amass information on criminal activity and witness criminal acts. PSCs and their personnel need to have defined and understood links to police and other public security institutions so that people’s rights are protected and PSC personnel can appropriately contribute to public security more generally.

At the same time, the industry needs clarity on which government authority takes the lead in PSC regulatory matters. According to June 2013 roundtable participants, the private security industry is currently a football kicked between the ministries of security, labour, and finance. National security ministries should take the lead in PSC regulation.

Transparency of PSC ownership and control is a must. Some countries apparently have regulations that require PSC employees to be properly vetted so that those with criminal records are excluded, but do not have similar checks on owners or directors of PSCs. (A particular problem discussed at length related to recent immigrants and deportees from Europe or North America, whose criminal records may not be accessible to national regulatory agencies, applying for PSC employment.) Roundtable participants called for only “fit and proper” persons to be allowed to own or direct PSCs, implying a vetting process for owners and directors. Transparency speaks to the need to “lift the corporate veil” so that adequate information is available on the ownership and control of PSCs. Public access to more detailed corporate information could expose any criminal elements in the management and ownership of PSCs.

Many retired or former police and military personnel are reportedly directing or working for PSCs. This situation creates both opportunities and dilemmas. The resulting familiarity with police procedures and processes can make communication with the police easier for private security personnel. It can also create real or perceived conflicts of interest for police if they are involved in some form of oversight of former colleagues.

With the pace of change in the private security industry it is advantageous for legislation to have a “constitutional” character that allows new developments to be accommodated under regulations and guidelines, which are much easier and quicker to change than legislation.

New or reformed PSC regulatory regimes should provide transitional periods for PSCs to grow into them. For example, high literacy standards may exceed the capabilities of some PSC employees. In such cases, employees should be given opportunities to upgrade their literacy skills, rather than simply being dismissed. In the transition period informal but fair solutions may be helpful.

**National and subregional security strategies and PSCs**

**RECOMMENDATION 2**
The important role of PSCs in providing public safety and securing vital economic interests should be reflected in the national security strategies of CARICOM members and in CARICOM subregional security strategies.

**COMMENTS**
The pervasive and sizeable presence of PSCs, including at some countries’ airports and ports, argues for explicit recognition in national public security strategies, including direction on how PSCs can increase public safety. This recommendation reflects the position taken in the **CARICOM Crime and Security Strategy 2013**: “The integration of the private security industry into any security plan is therefore critical in achieving a safe and secure environment for CARICOM, and has an important role to play in reducing crime in the Community” (IMPACS 2013, p. 19).
PSCs can be a security multiplier, enhancing public security for all citizens, and not only a fallback security system for those who can afford to pay. A PSC regulatory regime needs to be appropriately integrated into national and subregional security architectures. The roles played by PSCs that are critical to public safety and economic stability are the ones to be embraced in national and subregional security strategies.

Privide security industry codes of conduct

RECOMMENDATION 3
National PSC industry associations and member companies should adopt and modify for local circumstances the principles of the voluntary International Code of Conduct for Private Security Providers (ICoC [Switzerland 2010]).

COMMENTS
It is in the interest of the larger or more sophisticated PSCs to have internally generated industry codes of conduct and other initiatives to raise and maintain standards of staff training and oversight across the industry. There are voluntary PSC industry associations in some Caribbean countries that have taken a lead in this task. Smaller or informal PSCs have less incentive to support creation of industry standards or to be in compliance. This may argue for some type of graduated regime that creates standards for different levels or types of service. Appropriately recognized adherence to industry codes could provide a marketing advantage for individual PSCs and a means of distinguishing well-run PSCs from companies engaging in shoddy or illegal activities.

A number of national and international initiatives have been taken by states, the UN, NGOs, and civil society to create legal and regulatory frameworks that improve industry standards, clarify the role of states in their interaction with PSCs, harmonize national legislation, and improve overall accountability. The primary target appears to be private military companies, but private security companies are considered as well. Particular initiatives include: the Montreux Document, the International Code of Conduct for Private Security Providers, the Sarajevo Code of Conduct and Client Guidelines, and draft legislation produced by a UN Working group.

The Montreux Document is explicitly not legally binding, does not include any new legal obligations, and applies only to situations of armed conflicts. As a follow-up to the Montreux Document, the Swiss Government spearheaded another initiative that led to the development of the International Code of Conduct for Private Security Providers, which was signed by 58 companies in November 2010. Like the Montreux Document, the code is not legally binding, but stipulates that companies are bound by relevant national and international law. While only companies sign the code, states may support it by encouraging companies to sign and by making signing a requirement for licensing:

The International Code of Conduct for Private Security Providers (ICoC) … Articles of Association seek to establish this mechanism which will include certification, auditing, monitoring and reporting. By signing the ICoC, signatory companies publicly commit to operate in accordance with the Code. Signatory Companies are expected to seek to become members of the Association, which will start its functioning by the middle of 2013. Effective 1 Jun 2013 659 companies have signed the ICoC. (ICoC 2013)

Training

RECOMMENDATION 4
National training standards should be established and a national entity identified to provide PSC personnel with induction and in-service training.
COMMENTS
Basic training for PSC personnel should include principles of security, basic human and social psychology, communication skills, legal aspects of security, self-defence, first aid, operational instructions, tactical skills, protocol, and grooming. Armed and unarmed guards should complete the basic training courses; armed guards need additional training and certification for the possession and use of firearms. Instruction could be subcontracted by governments or PSC industry associations to recognized technical skills-training institutions and centres.

A growing market for increasingly sophisticated electronic security equipment suggests the need for basic technical training as well as refresher courses to keep PSC personnel abreast of advances in security systems.

Firearms regulation and PSCs

RECOMMENDATION 5
All national PSC regulatory regimes should contain comprehensive regulations on firearms use and monitoring, including training standards for armed PSC personnel.

COMMENTS
Armed PSC personnel create a potential danger to the public. Some Caribbean countries have neither special provision for training armed PSC personnel in firearms handling nor provisions for PSC firearms stockpile management.

In addition to the firearms regulatory regimes affecting all citizens, PSC regulatory regimes should contain explicit provisions on firearms training, quotas, and use; disposal or transfer of firearms and ammunition in cases of mergers and acquisitions by other companies; and decommissioning and destruction of firearms when they are no longer usable. Company firearms stockpiles should be subject to regular and spot checks to ensure proper firearms management, including secure storage.

Steps to increase the scope for implementation of this report

Distribution to stakeholders of a policy brief summarizing the findings and recommendations from this research report will take place in conjunction with the release of the published research report. The policy brief will be made available to governments and the private security industry in CARICOM member states, as well as to civil society organizations and academics working on Caribbean security issues.

Opportunities should be explored to create national multisector roundtables with governments, the private security industry, commercial entities that contract for private security services (e.g., financial, tourist, extractive industries), and civil society groups. This collaboration on strengthening the capacity and legitimacy of PSCs and the national regulatory regimes under which they operate would have as a primary goal enhancing the contribution of PSCs to broader public safety.

Further research

In the course of compiling and discussing the three case-study reports, a number of unanswered questions pointed to a future research agenda on PSCs in the Caribbean. Among the topics identified for research consideration are:

• Analysis of the factors—and their relative importance—in the growth of the private security industry in the Caribbean;
• Additional country case studies of the role and impact of PSCs in the Caribbean, to build on the research base provided by this report;
• A review of the trends and impact of advances in security technology that will inform the evolution of the private security industry and the parallel regulatory challenges posed by these trends;
• Measuring the impact by PSCs on violent crime rates and general public safety;
• The geographical distribution of concentrations of violent crime and how the spatial distribution of private security services relates to these concentrations;
• Labour market analysis of the private security industry, including compensation and benefits and working conditions;
• Obstacles to change or reform in PSC regulatory regimes, and how to mix incentives and disciplinary measures for private security self-regulation;
• The impact of public perceptions of violent crime and the contribution of PSCs to public calm;
• Economic analysis of the private security industry to establish relative costs and fair returns for security services and to assess the economic impact of the industry;
• The role and impact of proprietary private security services and whether these pose unique or different challenges for regulation from contract PSCs;
• Systematic research and analysis of actual PSC firearm possession, use, and control.

Conclusion

Participants at the June 2013 policy roundtable brought news that each of the three countries under study had imminent plans to present legislation for parliamentary debate or to modify or make additions to existing PSC regulatory regimes. There also were indications that the project research and the policy roundtable were spurs to action in the case-study countries. While these developments validated the currency of the project and its field-based research, they also raised the possibility that parts of the final report might be dated by its autumn 2013 publication. This development would be welcome. After all, the purpose of this research—including the inception workshops and the policy roundtable—was to assist CARICOM member states in achieving concrete reforms and improvements in PSC regulation and performance.

PSCs in the Caribbean subregion have a legitimate role to play in providing security to government, non-government, and commercial entities and individual citizens. The primary challenge identified in this report is to develop adequate regulatory regimes and appropriate working relationships between the public security sector and private security industry, so that PSCs maximize the benefits of private security services to the wider public. This also is the goal for subregional strategizing to improve the security framework of the Caribbean as a whole. This report and its recommendations are intended to assist CARICOM member states in meeting this goal.
References


www.academia.edu/1645297/Private_military_and_security_companies_in_Latin_America_the_relevance_of_the_Montreux_Document.


www.newyorker.com/reporting/2011/12/12/111212fa_fact_schwartz.


Review of Literature on Private Security Companies in the Caribbean

From conflict zones to shopping malls, from resource extraction sites to luxury tourist enclaves, private security has become a ubiquitous feature of modern life. While the 'monopoly of legitimate violence' continues to be one of the defining features of state sovereignty, and one of the most powerful elements of the modern political imagination, the realities of security today increasingly transcend its confines, and include a wide range of private actors. At its most controversial, private security is represented by the combat active soldier, heavily armed and actively involved in warfare. At its most mundane, it involves the unarmed guard at a hotel entrance, or a neighbourhood watch of concerned citizens mobilising local energies in the pursuit of safety and security. (Abrahamsen and Williams 2008, p. 539)

Introduction

Since the 1990s countries across the globe have seen an ever increasing number of private security companies (PSCs) operating within and across their borders. The proliferation of PSCs is a global phenomenon with far-reaching economic, political, and social implications. The private security industry is a relatively new, developing field of study that is seeing major contributions by academics, civil society, and governmental bodies.

This review seeks to accomplish a number of interrelated, though distinct tasks. The first section gives an overview of the literature available on PSCs and its main contributors. It highlights issues that may be of particular relevance to the study of PSCs in the Caribbean, identifies some of the gaps in the research, and suggests the contribution of this study. The second, more substantive section of the report is devoted to an overview of the main facts, ideas, themes, and issues covered to date. This section begins by discussing definitions of private security used in the literature and then provides an overview of global industry trends. Next, the report summarizes the central scholarly arguments about the causes and consequences of the global proliferation of PSCs. Finally, the report summarizes current research and reporting on regulating the private security industry.

Overview of the literature on private security

Study of the private security industry as a distinct phenomenon only began in earnest in the last decade, thanks in part to the U.S.-sponsored activities of private security actors in the Iraq and Afghanistan wars. Research on PSCs brings together input from many academic fields, ranging from political science, international relations, and international political economy to criminology, development, gender, and security studies. In addition to major contributions by academics, a number of important studies by civil society and governmental bodies have advanced policy discussions, especially on regulating the private security industry.

The literature can be divided into three main types:

- macro-level, theoretical studies by academics that assess the causes and consequences of PSC growth;
- case studies of PSCs, conducted mainly by academics, but sometimes by civil society or state actors;
- more policy-oriented research focused on regulating PSCs, conducted by civil society organizations, state actors, and academics.

Peter Singer’s 2003 book Corporate Warriors is an early seminal work in this field, along with Madeleine Drohan’s Making a Killing (2003) and Robert Mandel’s Armies without States (2002). Most of this early work focuses on the development and implications of what are often termed private military companies (PMCs). One body of literature focuses specifically on the use by the United States of PMCs in Iraq and Afghanistan, but is beyond the scope of this study.
Within a few years, contributions by Deborah Avant, Herbert Wulf, and Caroline Holmqvist added nuance to the analysis of a global trend in security privatization. The shift in focus to PSCs began around 2005, most notably with Rita Abrahamsen and Michael William’s Globalisation of Private Security (GPS) research project, funded by the New Security Challenges program of the Economic and Social Research Council of the United Kingdom. Their work assessed the impact of the privatization of day-to-day security services in four countries, after first “developing a theoretical framework for understanding the role of private security in late modernity and emerging structures of global governance” (GPS 2007). Their research has produced academic articles (2007a/b, 2008, 2009), three country reports/case studies (2005a/b/c), and a book, Security Beyond the State: Private Security in International Politics (2011).

Abrahamsen and Williams’ most significant contribution is their development of a theoretical framework to understand the growth of the private security industry and how PSCs derive authority in a changing, globalized world. They point to three main forces—the global dominance of neoliberal economics, the commodification of security, and the emergence of hybrid public-private security networks—to situate the private security industry in a globalized world in which the very nature of the state and structures of governance and authority are undergoing dramatic change. These ideas are particularly useful in situating the present research within broader conversations on security privatization and globalization.

A variety of disciplines connect work on PSCs with broader themes of transnationalism, globalization and global governance, criminology, and development. In private communications, Abrahamsen and Williams note that their own theory draws on insights from international relations, criminology, political theory, and sociology.

Since 2005 scholars have completed a number of country and regional case studies on PSCs. These studies give an overview of the size and growth of the industry in a given country and touch on government policies and regulatory frameworks, the relationship of PSCs with public security forces, and the impact of different sectors on the private security industry. These case studies add detail to our understanding of both overall trends and the diverse ways in which PSCs operate.

Most case studies focus on African countries, with an additional body of literature concentrating on PMCs in Iraq and Afghanistan. African countries studied to date include Kenya (Abrahamsen & Williams 2005a), Nigeria (Abrahamsen & Williams 2005b), Sierra Leone (Abrahamsen & Williams, 2005c), Democratic Republic of Congo (de Goede 2008), Uganda (Kirunda 2008), South Africa (Minnaar 2007; Taljaard 2008); Swaziland (Simelane 2007, 2008), Angola (Joras et al. 2008), and Somalia (Kinsey, Hansen & Franklin 2009; Hansen 2008, 2012).

A 2005 report prepared for the South Eastern and Eastern Europe Clearinghouse for the Control of Small Arms and Light Weapons (SEESAC) provides an overview of the trends in the region, as well as specific discussion of the private security industry in Albania, Bosnia and Herzegovina, Bulgaria, Croatia, Macedonia, Moldova, Romania, Serbia, Montenegro, and Kosovo (Page et al. 2005).

The Chilean-based Latin American Faculty of Social Sciences (FLACSO) produced a report on security in Latin America in 2007 that includes some discussion of PSCs. A 2009 FLACSO report by Patricia Arias focuses more specifically on PSCs in Argentina, Bolivia, Brazil, Chile, Colombia, Costa Rica, El Salvador, Guatemala, Mexico, and Peru; the report is available only in Spanish. A 2011 working paper by the United Nations Regional Centre for Peace, Disarmament and Development in Latin America and the Caribbean (UNLIREC) gives an overview of control and regulation of PSCs in select Latin American and Caribbean countries, including Belize, Jamaica, Trinidad and Tobago, Antigua and Barbuda, St. Lucia, and the Bahamas.

Little work has been done exclusively on the Caribbean. Geoff Burt (2012) and Anthony Fenton (2010) have researched private security in Haiti. As well, two unpublished works/works in progress may be useful for this study. A Master’s paper by Callixtus Joseph (2007) at The University of the West Indies examined the regulatory dimension of PSCs in St. Lucia and provides a good example of case study research in the Caribbean. Sheridan Hill, a consultant on Caribbean security, is currently working on a book on the private security industry in the Caribbean. (See also Hill 2010.)
The 2005 SEESAC report could serve as a useful model of integrating case studies of various countries into a regional overview. It includes research instruments that could be adapted for primary research. Joseph’s thesis includes a discussion of methodology, as well as interview guides for police officers, security sector public servants, and a questionnaire for private security contractors that he adapted from the SEESAC report.

Early research on PSC regulation was done by Christopher Spearin (2003), Sarah Percy (2006) and Caroline Holmqvist (2005, 2007). They assess reasons for the current lack of industry, national, and international regulatory frameworks and argue for greater regulation. Renée de Nevers has written on the effectiveness (or not) of self-regulation in the industry (2009, 2010). James Cockayne and associates completed a study that examined legislative frameworks for other global industries that could apply to the private security industry, and then proposed five potential approaches to better regulate and control the security industry. Their study resulted in a full-length book (2009), as well as a much shorter policy paper and policy brief.

Civil society organizations (CSOs) such as Saferworld (Makki et al. 2001; Richards & Smith 2007), the International Committee of the Red Cross (2013), and the Parliamentary Forum on Small Arms and Light Weapons (2010) have sponsored research and reports on the legislative and regulatory dimension of the private security industry. They advocate strongly for policies to implement more effective regulation.

The 2011 Small Arms Survey report also includes a chapter on PSCs and firearms, as well as PSCs and multinational corporations. While these chapters are not explicitly policy focused, they highlight understudied issues related to PSCs (especially the link to firearms), which have direct policy implications.

Born, Caparini, and Cole (2006), writing for the European Committee on Crime Problems, produced a sizeable report on regulating PSCs in Europe. José Gomez del Prado (2013) has written a report about mercenaries and private military and security companies (PMSCs) for a Montreal-based nongovernmental organization (NGO), the Centre for Research on Globalization.

The Swiss government has spearheaded an initiative resulting in a best-practices framework for states in their use of PSCs (the Montreux Document [FDFA & ICRC 2009]) as well as an International Code of Conduct for private security companies (Switzerland 2010). A UN Working Group established in 2005 to expand the scope of the UN Special Rapporteur on Mercenaries to include PSCs and PMCs has also completed some work in this area. It has produced a number of country reports and public statements, as well as draft legislation for a legally binding instrument that would regulate the activities of PMCs and PSCs worldwide (see OHCHR 2011).


Studies on the role of PSCs in broader Security Sector Reform (SSR) discussions (Lokuji, Abatneh & Wani 2009; Richards &- Smith 2007; Pearce 2006) as well as the role of gender in PSCs (Schulz and Yeung 2008; Myrtinnen 2009) are relevant, as is research that specifically addresses PSCs and small arms and light weapons (SALW) proliferation, such as that by Cattaneo and Parker (2008) and Rogers (2009).

Study of the link between PSCs and SALW is a relatively new undertaking. Very early and preliminary work on this topic includes a short 2001 article by Makki and colleagues and a 2010 handbook prepared by the Parliamentary Forum on Small Arms and Light Weapons, as well as the previously mentioned chapter and recently released chapter on PSCs by the Small Arms Survey.
Defining private security

The term “private security” refers to a wide variety of private security and military services, ranging from home alarm systems to mercenary activities. Simply put, PMCs/PSCs are defined as “private business entities that provide military and/or security services” (FDFA & ICRC 2009), or “private, for profit companies that carry out tasks traditionally associated with the state security sector (whether police, military, or intelligence agencies)” (Holmqvist 2007, p. 3).

A common approach by scholars is to differentiate private military companies from private security companies. Peter Singer (2003, p. 93) uses a “tip of the spear” analogy to distinguish between private military firms that offer services either closer to, or more removed from, the battlefield. He uses the umbrella term “Private Military Firms” (PMFs) to refer to all such companies, and subdivides them into “military provider” firms that engage in active military combat; “military consultant” firms that offer services that include military training, military advice to foreign governments, and planning of security sector reform; and “military support” firms that provide operational and logistical support. Following on Singer’s definition, many scholars distinguish between PMCs and PSCs, although it is important to note that the development of the term “PSC” corresponds to a broadening of the field of study to include companies offering services that are not oriented to direct participation in military operations.

PMCs and PSCs are often differentiated in the literature in one of two ways: by defining PMCs as offensive in nature and PSCs as defensive, or by delineating the specific military services PMCs may provide compared to the security services PSCs may provide. PMCs are defined as companies that offer services related to military action, such as logistical support and accommodation of troops; transportation of troops; consulting and training of military and paramilitary units; strategic planning; intelligence; investigation; land, sea, or air reconnaissance; flight operations; materiel and technical support to armed forces; and active participation in combat (Swiss Federal Council 2005, p. 9; UNHRC 2010, p. 13; Holmqvist 2005, pp. 4-5).

PSCs, on the other hand, provide services that may include armed or unarmed guarding; protection of buildings and persons; transportation of persons or valuables; escorting and protecting humanitarian aid convos; training police units; advice on matters of security, organization, and logistics; logistical support; running prisons; and investigations similar to those carried out by private investigators (Swiss Federal Council 2005, p. 9; UNHRC 2010, p. 13; Holmqvist 2005, pp. 4-5; Maki et al. 2001, p. 4). PMCs most often operate in settings of armed conflict or are contracted by the defence/military sectors of states, making state entities their most frequent clients. PSCs, however, tend to operate all over the world—in settings of both armed conflict and stability—and have a much more diverse clientele, ranging from state actors to NGOs, the United Nations, transnational agencies, police services, multinational corporations (especially in the extractive industry), businesses, and private individuals.

Although distinguishing between PMCs and PSCs may be helpful, some analysts argue that this can also be problematic. Holmqvist notes the offensive/defensive division is not as clear-cut as it may seem (2005, p. 5). Similarly, Percy (2006, p. 13) points out that there is a challenge to categorizing PSCs/PMCs based on the services they perform, as the services a given company may offer are often broad and sometimes evolve, and may be more or less lethal at different times. The Parliamentary Forum on Small Arms (2010, p. 1) also notes that, although distinguishing between PMCs and PSCs (and mercenaries, for that matter) may be analytically useful, “operational experience shows that private security is interlinked.”

In most conversations about regulation, PMCs and PSCs are considered one entity. Both the UN Working group and the Swiss-led initiatives implicitly accept a distinction between PMCs and PSCs, but consistently refer to them together as “private military and security companies” (PMSCs). Cockayne uses the inclusive label “global security industry” (GSI). To make matters more complex, some scholars use “PSC” to refer to what others have classified as “PMCs”; this is the case in Avant’s early work and in Percy’s work. Others still use “PSC” to refer to both PMCs and PSCs. Abrahamsen and Williams, for example, use “PSC” in all their work. While they do focus less on military companies, they seem to implicitly view both private military and security providers as part of the same phenomenon of globalization of private security.
For this research it will be important to establish a working definition of PSCs that will be appropriate for the Caribbean context and for the scope and objectives of the research. One approach, which finds precedence in Percy’s work, would be to define PSCs as “private, for-profit companies operating within the Caribbean that provide security and/or military services.” While in the case of the Caribbean we expect to find that most companies offer security, not military, services, this definition would not limit the study from considering military services if they exist, or companies operating in the Caribbean that may provide military services elsewhere.

Global industry trends

Although reliable statistics on the global revenues of the private security industry are hard to come by, the most frequently cited source (from 1997) put total revenues at $55.6-billion in 1990 and projected revenues of $202-billion by 2010. Other estimates suggest this figure may be too low (Avant 2005b, Holmqvist 2007). In 2007 Abrahamsen and Williams estimated the industry “had a total value of $67.6 billion” (2007b, p. 239); in 2009, citing a 2007 Securitas report, they note that “the commercial private security market [was] valued at $165 billion,” with a forecasted annual growth rate of 8 per cent (p. 1). Taking a slightly different approach to valuing the industry, Avant notes that half of the U.S. Department of Defense budget goes directly to contractors; 56 per cent of this amount is for services, not goods. Thus the U.S. government market alone can be valued at over $100-billion (Avant 2005b, p. 122). The August 2011 report by the United States Commission on Wartime Contracting in Iraq and Afghanistan (p. 2) estimated that spending on contracts and grants was expected to exceed $206-billion in 2011.

A look at the revenue of the largest transnational security firms is also revealing. Securitas, a Swedish Company founded in 1932, expanded rapidly in the 1990s and now has over a quarter-million employees in 30 countries. In 2007 Securitas annual sales totalled $10.6-billion (Abrahamsen & Williams 2009, p. 3). Group4Securitor, which became the largest PSC in the world after a 2004 merger, operates in more than 115 countries and has 530,000 employees and an annual turnover of $9-billion (Abrahamsen & Williams 2009, p. 2). Whatever the actual value of the industry, it is safe to say that the industry begins to mushroom in the 1990s and has maintained an upward trend.

While the ratios vary from place to place, in both developed and developing countries the number of private security staff exceeds the number of police. Ratios tend to be higher in developing countries where private security employees outnumber public police by as much as 10 to 1 (Abrahamsen & Williams 2007, p. 239).

Causes of the global proliferation of private security

While high rates of crime and insecurity may be understood as the central impetus for the growth of PSCs in an immediate sense, scholars tend to point to broader, post-Cold War socioeconomic and political trends to explain the industry’s growth.

Some authors note the ascendancy and dominance of free market, neoliberal economic policies that resulted in a reduction in state expenditures and a push toward privatizing traditional government functions. This trend began in the 1970s, but accelerated with the end of the Cold War (Holmqvist 2005, 2007; Abrahamsen & Williams 2007b, 2009). Such policies have facilitated PSC growth in two ways:

• Decreased state expenditures have resulted in decreased state capacity to deliver security services and increased demand for private service providers;
• PSCs have come to be seen as legitimate security actors, even though states previously held a monopoly on this activity (Abrahamsen & Williams 2007b, p. 241).

The security vacuum created when the superpowers disengaged from the developing world with the end of the Cold War is a second frequently noted factor for the rise of PSCs. This particularly helps to explain the growth of PSCs in the former Soviet Union and many African countries, where NGOs and corporations quickly came to rely on private security providers (Holmqvist 2005, 2007; Makki et al. 2001; Avant 2007).
The security vacuum is also frequently cited to explain fragile or failing states. Holmqvist contends that the rise of PSCs can be seen as a homegrown response or even a “dictated choice” to insecurity in settings in which state capacity is severely compromised by corruption and political cronyism (Holmqvist 2005, p. 12).

To explain the supply side of the industry’s growth, authors point to the post-Cold War downsizing of national armies, which created a large pool of unemployed security and military personnel (Makki et al. 2001; Holmqvist 2005, 2007). In specific post-civil war countries, DDR (disarmament, demobilization, and reintegration) programs had the same effect. A few authors also point to the opening of the international arms trade and the increasing availability and accessibility of weaponry (Makki et al. 2001). Another suggestion is that the privatization of security is a logical progression from the privatization of the armaments industry in Europe and North America (Holmqvist 2005, p. 2). Discussion of the links between the armaments industry and SALW proliferation and private security companies, however, remains very limited.

While the factors explored above help to explain a global turn to privatized security, “explanations for the industry’s growth vary with the specific security context” (Holmqvist 2005, p. 2). Case studies indicate a variety of immediate factors that explain the growth of PSCs in particular locales. A cursory overview of case studies reveals myriad factors that have facilitated the industry’s growth.

In post-apartheid South Africa DDR programs facilitated growth in the industry; many demobilized security personnel found work in the sector and the industry was a huge source of foreign direct investment (Gumedze 2008, p. viii; Taljaard 2008). In Nigeria the growth of the oil industry resulted in extreme inequality, a rise in crime, and general insecurity, with the police significantly involved in corruption and crime. PSCs emerged as a security provider more trustworthy than corrupt police, employed mainly to guard wealthy enclaves and assist in the extractive industry (Abrahamsen & Williams 2005b). The “rapid growth of international and multilateral organisations and companies, which are operating within the post-conflict transition and reconstruction programmes” explains the increase in PSCs in the Democratic Republic of Congo (Gumedze 2008, p. viii). In Uganda the privatization of the economy in 1998 led to an increase in private property, which precipitated a rise in crime and drove up demand for security services (Gumedze 2008, p. viii; Kirunda 2008). In Sierra Leone extended armed conflict and the distrust it created, combined with an extensive international presence involved in post-war security sector reform, have precipitated a huge growth in the number of PSCs (Abrahamsen & Williams 2005c). In Kenya corruption and mismanagement of state funds have created a distrust of public security forces that, along with increasing urban unemployment and rising crime rates, have facilitated growth in the private security sector (Abrahamsen & Williams 2005a).

**Consequences of the global proliferation of private security**

Avant (2005) and Holmqvist (2007) have argued that a division into optimistic and pessimistic views of PSCs has tended to obscure the industry’s varied impact, which depends on, inter alia, the socioeconomic and political climate of a country, government regulations, and services provided. PSCs affect different countries in different ways at different times.

At their best, analysts have argued, PSCs can provide a necessary additional resource in the fight against crime. PSCs may have access to superior equipment and may provide a more efficient response to crime, especially in weak states (Holmqvist 2005). PSCs may provide an effective way to get around bureaucratic and/or political failures that leave some security needs unmet. Avant notes, for example, that the private sector is much more flexible than government forces and does not require the same type of political mobilization (2005b, p. 126). The private sector can offer a more politically expedient, manageable, and cost-efficient way to increase overall security.

PSCs may have a positive economic impact. As an important source of employment they provide many families with an income. The state benefits through taxes on PSCs and their employees and levies on the importation of equipment. PSCs encourage foreign direct investment; businesses are more likely to invest if they know that their assets and property will be protected. This appears to be the case in Uganda and South Africa (see Kirunda 2008; Taljaard 2008).
Holmqvist (2005) has argued that in weak states, PSCs can help to support peace operations, especially after other organizations or states have failed to provide adequate support. And they can lend valuable support to aid operations by providing security for UN agencies, NGOs, etc.

Researchers have noted a number of negative political and socioeconomic impacts caused by PSCs. The most frequently cited is the role that PSCs can serve in perpetuating inequality (Abrahamsen & Williams 2011; Kirunda 2008; Holmqvist 2005). Once the right of all citizens, security has increasingly become a commodity available only to those who can pay for it. Thus PSCs tend to reinforce and deepen existing socioeconomic cleavages and inequalities, shifting crime into lower-income neighbourhoods.

In some cases PSCs may actually contribute to insecurity by creating “a false image of security in the short term, which distorts proper assessment of security needs” and by crowding out legitimate security actors—both of which can have long-term negative implications for the security environment (Holmqvist 2005, p. 25). While empirical evidence appears limited, anecdotal evidence points to links between private security personnel and crime (see Kirunda 2008, pp. 14-15; Page et al. 2005, p. iv).

Links between PSCs and the proliferation of SALW have been noted and can have a negative effect on the overall security environment. A 2001 report suggests that PSCs/PMCs may contribute to the proliferation of arms through arms brokering and transportation activities, by violating UN arms embargoes, through their “impact on human rights and humanitarian law,” and by driving up the demand for small arms (Makki et al. 2001, p. 2). While this study seems to focus more on PMCs, the 2010 Handbook by the Parliamentary Forum on Small Arms and Light Weapons points out that an increase in PSCs often means an increase in the number of armed individuals in a society. Without significant oversight and accountability they can negatively affect the overall security environment. This topic is rarely covered in the literature and demands more attention by researchers.

Beyond specific socioeconomic and political consequences, the proliferation of PSCs has deeper implications for state authority, global governance, and the concept of security.

Private security challenges the Weberian notion of the modern state, which is characterized as having a monopoly on the legitimate use of force (Holmqvist 2007, p. 1). While states continue to be seen as the leading actors in the international system and can “still claim the prerogative of creating and judging political legitimacy,” Holmqvist notes that “if the state is undercut or marginalized in this respect, there is a risk that one of the traditional cores of security governance—states’ collective as well as general control of the use of force—will be destabilized, affecting not only the state actor but also the international system itself” (2005, p. 8).

Abrahamsen and Williams (2009) address the way in which a global trend to private security marks a shift in global structures of authority and governance. They argue that the existence of PSCs and their increasing authority should not necessarily lead to the conclusion that the state is under fundamental threat; rather, their presence is part of a broader global transformation in structures of governance and authority.

Viewing security as a private good or commodity to be bought and sold has grave implications for concepts such as human security and the Latin American/Caribbean notion of “citizen security,” which hold security to be a fundamentally public good that is the right of all. Although this approach is not taken in much of the literature to date, framing this study through a human security and/or citizen security paradigm could be a useful and important way to make sense of the broader implications of PSCs and the trend to privatize security.

**Regulation of private security companies**

Scholars, NGOs, civil society groups, and state bodies tend to agree that current regulations governing PSCs are deficient, and that without improved regulation PSCs will continue to have negative effects. Both self-regulation and national/international regulation of the private security industry present challenges. Although some industry associations have voluntary or self-generated standards, commitment and enforcement are haphazard (Cockayne & Mears 2009, p. 4). Without stronger
incentives, especially demand from consumers or clients—who, to date, seem most concerned with price—the level of industry commitment to these standards remains uncertain (de Nevers 2010, pp. 235-6).

National regulations also face problems. Not all states have the capacity to regulate PSCs effectively. Because PSCs may be registered in one state, operate in another, and be contracted by a third, national legislation and regulations may have insufficient reach. And, while states may establish standards to regulate how they contract and use PSCs, these standards may have little bearing on non-state clients (Holmqvist 2007, p. 18).

While international humanitarian law and human rights law may serve as instruments to hold PSCs accountable, there are few effective enforcement mechanisms. The most cited international convention is the 1989 UN International Convention against the Recruitment, Use, Financing and Training of Mercenaries (which entered into force in 2001), but the term “mercenary” as defined by the Convention does not cover legally operating PMCs or PSCs, making the convention almost irrelevant in this case (Holmqvist 2007). While the UN Working Group has made some progress in developing standards for PMCs/PSCs at the international level, Cockayne and Mears (2009, p. 5) suggest that “acting alone, the Working Group currently lacks the resources, as well as the access to PMSCs, territorial states, and exporting states—and their enforcement power—and it would need to develop such a framework for consensual regulation of the industry at the multilateral level.”

There seems to be growing consensus that the private security industry, because of its nature and the type of commodity it provides, needs a distinctive regulatory mechanism and an international—or at least regional—approach.

Based on a review of standards from other global industries, Cockayne and colleagues (2009, p. 236) suggest five potential frameworks for regulating PSCs: a global watchdog, an accreditation regime, an arbitral tribunal, a harmonization scheme that incorporates the Montreux Document, and a Global Industry Club. Any response should involve all relevant stakeholders (state and non-state), use “smart incentives,” improve accountability to clients, and assist states in their duty to protect human rights.

Holmqvist argues that both legal and regulatory frameworks can be useful for national, regional, and international responses to PSCs. Legal frameworks have the capacity for retribution and may have a deterrent effect. Regulatory frameworks are largely non-enforceable, but could serve a preventive function and encourage good practice in the industry. Holmqvist believes that some combination of these two approaches will be most effective (2005, p. 43). Like Cockayne, Holmqvist suggests “harmonization of national legislation amongst the key exporting states...as the most plausible attempt at betterment of control on the international level” (2007, p. 20). Harmonization of national legislation stands out as an appropriate regional approach for CARICOM to consider.

Recently a number of initiatives have been taken by states, the UN, NGOs, and civil society. They include both legal and regulatory initiatives to improve industry standards, clarify the role of states in their interaction with PSCs, harmonize national legislation, and improve overall accountability. Four initiatives stand out: the Montreux Document (FDFA/ICRC 2009), the International Code of Conduct for Private Security Providers (ICoC [Switzerland 2010]), the Sarajevo Code of Conduct and Client Guidelines (SEESAC 2006a/b), and draft legislation produced by the UN Working group (UNHRC 2010).

From 2006-2008 the Government of Switzerland and the International Committee of the Red Cross spearheaded an initiative that included input from government experts, civil society, and private security industry representatives. It led to the Montreux Document, which was endorsed by 17 states in September 2008. The document is not legally binding, does not include any new legal obligations, and applies only to states (not non-state actors) dealing with private military and security companies in situations of armed conflict. Despite these limitations, Cockayne and Mears (2009, p. 5) note that the Montreux Document is “the most coherent, precise, and widely supported statement of ‘good practice’ related to the global security industry.” (See also DCAF 2011; Perret 2011.)
As a follow-up to the Montreux Document, the Swiss Government spearheaded the development of the ICoC, which was signed by 58 companies in November 2010. As with the Montreux Document, the code is not legally binding on companies, but stipulates that they are still bound by relevant national and international law. While only companies can sign the code, states may encourage companies to sign it and make adherence to it a requirement for licensing.

A Special Rapporteur on Mercenaries reports to the UN Human Rights Council (HRC). Although PSCs and PMCs are not included in the standard definition of “mercenaries,” in 2004 the Rapporteur’s mandate was extended to include PMSCs. In July 2005 a Working Group was formed to consider the definition of “mercenary,” make country visits, issue press statements in relation to PMSCs (usually to condemn certain actions), report to the HRC, and draft an internationally legally binding instrument on the operation of PMSCs. The 2011 UNLIREC report assesses the viability of this draft legislation for Latin America and the Caribbean.

A final initiative that may be of interest and relevance to the current research study is a regional process from South East Europe. In 2005 Saferworld and local civil society organizations conducted a study of PSCs in the region and found that, although most governments had some type of legislation, there were many problems with implementation and oversight (Page et al. 2005). They also found that clients needed to do far more to help raise standards, as the awarding of contracts was most often based on cost alone.

In response to these findings, in 2006 Saferworld and the Centre for Security Studies (Bosnia and Herzegovina), with financial and technical support from SEESAC, which has a mandate from the UN Development Programme and the Stability Pact for South Eastern Europe, convened the Sarajevo Process. Over a series of meetings and roundtables, the group drafted a code of conduct for industry members, as well as a set of procurement guidelines for client organizations. The code contains a set of basic standards of professionalism and service delivery for PSCs and covers a broad range of topics. The Client Guidelines outline voluntary procurement procedures that clients are advised to follow when contracting with security providers, emphasizing that clients should consider not only cost, but also standards of internal governance, service quality, levels of training, and adherence to national legislation and codes of conduct.

Conclusion

There is, as yet, little primary or field-based research on PSCs in the Caribbean subregion. Our project will fill in important gaps in the new and blossoming field of private security. Case studies provide important details and nuanced understandings. Of particular value will be an examination of the links between PSCs and small arms. Discussion of regulation is also timely. A more in-depth understanding of the role of PSCs in the Caribbean could contribute much to a global understanding of the impact of this industry on human security.

The literature that has been assembled can be used by CARICOM member states to illustrate the challenges that they must address, individually and collectively, to meet legitimate concerns about security and firearms. Scholars have created a solid basis for understanding factors leading to PSC growth and the consequences of that growth.
Bibliography


http://www.didierbigo.com/students/readings/abrahamsenwilliamssecurityassemblageIPS.pdf.


http://users.aber.ac.uk/rbh/privatesecurity/publications.html.

http://users.aber.ac.uk/rbh/privatesecurity/publications.html.

http://users.aber.ac.uk/rbh/privatesecurity/publications.html.

Arias, Patricia. 2009. Seguridad Privada en América Latina: el lucro y los dilemas de una regulación deficitaria. Santiago, Chile: FLACSO.

Avant, Deborah. 2007. NGOs, corporations and security transformation in Africa. International Relations 21:2, pp. 143-161.


Cattaneo, Silvia and Sarah Parker. 2008. Implementing the United Nations Programme of Action on Small Arms and Light Weapons: Analysis of the National Reports Submitted by States from 2002 to


Additional resources


Useful websites


International Relations and Security Network, Centre for Security Studies, Swiss Federal Institute of Technology Zürich (ETH Zürich), Private security, http://www.isn.ethz.ch/isn/Find-Information/Regions/Keyword-Object/?fecvnodeid=127100&groupot593=0c54e3b3-1e9c-be1e-2c24-a6a8c7060233&dom=1&fecvid=21&ots591=0c54e3b3-1e9c-be1e-2c24-a6a8c7060233&lng=en&v21=127178&click571=127178.


Contributors

Matthew Bishop is lecturer in International Relations at The University of the West Indies, Trinidad and Tobago. He is a political economist by training and has published widely on issues relating to small states, Caribbean development, global trade politics, climate change, and governance. He is the author of two books: The Political Economy of Caribbean Development and, with Jean Grugel, Democratization: A Critical Introduction, both published by Palgrave Macmillan in 2013.

Kenneth Epps is Senior Program Officer with Project Ploughshares. Since joining Project Ploughshares in 1986, he has conducted research and policy analysis on issues related to small arms and light weapons, the international arms trade, and Canada’s military industry. Previously he was coordinator of the Global Community Centre, a development education centre in Kitchener, Ontario.

Sheridon Hill is a police officer and Attorney-at-Law in the Legal Unit of the Trinidad and Tobago Police Service and member of the Inter University Consortium on gang violence in the Caribbean. He has served as Program Manager and Caribbean Relations Specialist in the Secretariat of the Inter-American Committee against Terrorism (CICTE) and Department of Public Security (DPS) in the Organization of American States. He is the author of “The Rise of Gang Violence in the Caribbean” in Gangs in the Caribbean (forthcoming) and other articles on gang violence, policing, and crime in the Caribbean.

Annita Montoute is Lecturer at the Institute of International Relations of The University of the West Indies. With a PhD in International Relations, she focuses her research on civil society participation in the development of trade policy, crime and security, and emerging players in the global economy.

John Siebert is Executive Director of Project Ploughshares. He has led research and consultation processes in the Horn of Africa and the Caribbean, chairs the Governance Group of the Space Security Index project, and has written extensively on the Responsibility to Protect and Canadian military expeditionary missions. Previously he served as a Foreign Service Officer with the Canadian Department of External Affairs and International Trade.
Appendix 1:
Recommendations

St. Lucia

RECOMMENDATION 1
With respect to the Private Security Act No. 28 of 2006, we recommend that the state amend the current legislation or pass new legislation. In both instances the state should include the key regulatory issues (employment criteria, identification badges, powers of arrest, authority to carry firearms while on duty, etc.) in the legislation and leave the responsibility for oversight and enforcement to the Private Security Authority. Both options would alleviate the burden on the Authority of making rules and regulations in addition to providing oversight and enforcement of those regulations. We therefore expect these actions to simplify the legislation and expedite the appointment of the Private Security Authority, whose primary function would be to enforce the necessary regulatory framework.

RECOMMENDATION 2
The Firearms Act No. 9 of 2003 should also be amended to expressly provide for quotas and mergers, as well as the acquisition, decommissioning, and destruction of firearms. These provisions are not currently included in the Act. While there are general prohibitions relating to the sale, licensing, and possession of firearms under the Act, they do not adequately address these specific concerns. And, while the current Private Security Act No. 28 of 2006 gives the Minister the authority to make regulations covering these issues, such authority should be expressly provided for in the Firearms Act No. 9 of 2003, which is the primary piece of legislation governing the control of firearms. Any other law or bylaw (as provided in the Private Security Act No. 28 of 2006) would simply reinforce the provisions of the Firearms Act.

RECOMMENDATION 3
We recommend that company legislation should contain express provisions relating to private security companies and the use of firearms. It should clearly identify the services that can be provided by these companies by referring to other applicable laws of St. Lucia, such as the Firearms Act No. 9 of 2003. This recommendation would be satisfied if the Private Security Act No. 28 of 2006 were to be implemented in its current form, thereby creating a separate system of registration, licensing, and maintenance of records of private security companies.

RECOMMENDATION 4
There should be clear guidelines on the renewal of licences for the operation of private security companies. The provision of a licence should not be for life, but should be subject to periodic review, after which the decision would be taken to either renew or not renew the existing licence.

RECOMMENDATION 5
We recommend increased vigilance by the police in enforcing the Firearms Act No. 9 of 2003, particularly inspections of firearms owned by private security companies. We also recommend improved monitoring of the firearms training given to applicants for the Firearms User’s Licence.

RECOMMENDATION 6
The future of oversight and enforcement in the industry depends on the adoption or amendment of the Private Security Act No. 28 of 2006. If the current Act is implemented in its original form, we recommend that the state provide the Private Security Authority with sufficient staff, funding, and resources to function effectively. This recommendation is made in light of the challenges experienced by Jamaica’s PSRA and other Caribbean countries with similar models of regulation. We recommend close collaboration between the state (Ministry of Home Affairs), police (the body responsible for enforcing key provisions in the Firearms Act No. 9 of 2003 vis-à-vis the industry), and the owners and operators of private security companies.
RECOMMENDATION 7
The Private Security Authority should establish a mechanism for determining the good character criteria of private security owners and managers. The definitions of a “fit and proper person” in legislation in Caribbean countries such as St. Vincent and the Grenadines may be helpful.

RECOMMENDATION 8
The Licensing Authority should establish fixed criteria for standards in security training. A training syllabus should be issued; specific institutions should be accredited by the Authority to conduct security training; and companies should be given a six-month timeframe after the Act is operational in which to comply with the training requirements.

RECOMMENDATION 9
Developing institutional structures to encourage and facilitate information sharing is important to reduce and possibly eliminate the entry of criminal elements into the industry. We recommend establishing a database in which companies will input employee information, including the records of all security officers whose services have been terminated for illegal activities or discreditable conduct. This information should be kept by the Private Security Authority and shared among registered private security companies, the police, and related agencies and departments. This would help to minimize the instances in which private security companies employ security officers whose services have been terminated by other companies for inappropriate behaviour.

RECOMMENDATION 10
Any amended or new legislation should be based on wide consultations with stakeholders in the private security industry.

Trinidad and Tobago

RECOMMENDATION 1
The Ministry of National Security should immediately bring forward the legislation required to regulate the industry and mandate a review panel to monitor its implementation and suggest future amendments as its implications become clear.

RECOMMENDATION 2
Special attention should be paid to employment issues, including the introduction of a sectoral minimum wage. The EPA, or a similarly mandated organization, should have the statutory right to represent all officers, whether precepted or not. Robust channels should be constructed so that officers have recourse for the protection of their wages, terms, conditions, and rights.

RECOMMENDATION 3
Beyond the various firearms acts, regulation of the industry should lay down clear guidelines on monitoring, management, and infrastructure for firearms, based on best practice in the industry. Enforcement should be stringent. At present, the T&T Police Service undertakes issuing, vetting, and monitoring; these three roles could be separated. Vetting, in particular, could be taken over by an independent body, as the TTPS do not have the resources to engage in a proactive auditing process.

RECOMMENDATION 4
Regulation should include the licensing of all officers, precepted or not. Provision should be made for the licensing of PSCs and their executives, including a specific training requirement for managers and owners of firms.

RECOMMENDATION 5
Mandated training programs should be created. A private security academy with statutory underpinning might also be started; it could link the public and private security institutions, as well as academia, government, and other interested actors.
RECOMMENDATION 6
An umbrella institution should be formed to bring together public security agencies and PSCs to achieve greater co-ordination of activity, training governance, information sharing, synergies, etc.

Jamaica

RECOMMENDATION 1
The Jamaican experience in PSC regulation through the PSRA should be shared with appropriate regulatory agencies and other relevant parties in all CARICOM member states.

RECOMMENDATION 2
The PSRA should be given the legal authority and resources to encourage and impose national PSC regulations and standards and, as necessary, prosecute offenders.

RECOMMENDATION 3
An innovative multi-sector approach to guard training, with buy-in from the PSRA, FLA, PSCs, and educational institutions and experts, could provide options for improved, standardized, and swifter training and certification of PSC guards.

RECOMMENDATION 4
With support from the PSRA, the industry should develop and adopt common best practices to standardize employee benefits, conditions, and responsibilities.

RECOMMENDATION 5
The National Security Policy for Jamaica should pay specific attention to both the regulation of PSCs and their role in enhancing security in Jamaica, so that PSCs are effectively regulated and integrated into the national security program.

CARICOM subregion

RECOMMENDATION 1
All CARICOM members should establish national legislation and related regulations, standards, and oversight and monitoring bodies to regulate the private security industry. These national regulatory regimes should reflect common principles among CARICOM members and emerging international standards for PSCs.

RECOMMENDATION 2
The important role of PSCs in providing public safety and securing vital economic interests should be reflected in the national security strategies of CARICOM members and in CARICOM regional strategies.

RECOMMENDATION 3
National PSC industry associations and member companies should adopt and modify for local circumstances the principles of the voluntary International Code of Conduct for Private Security Providers (ICoC [Switzerland 2010]).

RECOMMENDATION 4
National training standards should be established and a national entity identified to provide PSC personnel with induction and in-service training.

RECOMMENDATION 5
All national PSC regulatory regimes should contain comprehensive regulations on firearms use and monitoring, including training standards for armed PSC personnel.
Appendix 2:
Case study questionnaires

Field research for the case studies relied on survey questionnaires that were distributed to senior officials in private security companies and used in elite interviews with industry and government experts. The survey questions were the product of an inception workshop held at The University of the West Indies in November 2010 to identify the questions and respondents necessary to complete the picture of PSC operation and regulation in the Caribbean region. Case study researchers subsequently adapted the questionnaires to the operational and regulatory context of respondents in each country studied.

The following two sample survey questionnaires are representative of several survey variations used in each case study. The first is the survey questionnaire distributed to senior officials of several PSCs in Jamaica. The second is the questionnaire used for elite interviews with officials from the Private Security Regulation Authority in Jamaica. Similar questionnaires were used to interview officials of other Jamaican government agencies and ministries as well as representatives of industry associations.
Survey of Contract Private Security Companies

SECTION A: COMPANY AND KEY CHARACTERISTICS

A1. Company Information
Respondent ID # (Do not fill in) _________________  Date (DD-MM-YY) _______________

1. Company Name: ________________________________________________________________
2. Address: ___________________________________________________________________
3. Name of Respondent: ____________________________________________________________
4. Title/Position in the Company: __________________________________________________
5. Year company first started operating in Jamaica _________
   Year first licensed in Jamaica _________
6. Ownership of your company (please check one)
   □ Nationally (Jamaican) owned       □ Multinational/International
   □ non-Jamaican but Caribbean        □ Other, please specify___________________

A2. Markets/clients served and types of services offered

7. Which client groups or markets listed below are being serviced by your company now?
   Please check as many as applicable. Which of these markets are the top three most
   important to your company in terms of revenue? Please rank 1(highest), 2 and 3 in the
   right column

<table>
<thead>
<tr>
<th>Client Group/Market Served (check all that apply)</th>
<th>Rank 3 only Top first 3 revenue sources</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Agriculture and mining industry (farms, plantation, mines)</td>
<td></td>
</tr>
<tr>
<td>□ Banks/financial institutions</td>
<td></td>
</tr>
<tr>
<td>□ Commercial &amp; retail (private offices, malls, stores)</td>
<td></td>
</tr>
<tr>
<td>□ Embassies, international organizations</td>
<td></td>
</tr>
<tr>
<td>□ Government facilities (offices, prisons, utilities, power)</td>
<td></td>
</tr>
<tr>
<td>□ Hospitality &amp; tourism (casinos, hotels, resorts, restaurants)</td>
<td></td>
</tr>
<tr>
<td>□ Institutional (health facilities, sports, schools, universities)</td>
<td></td>
</tr>
</tbody>
</table>


### Client Group/Market Served
(check all that apply)

- [ ] Manufacturing Industry
- [ ] Private residences (homes, condos, subdivisions)
- [ ] Transport facilities (airport, port, marina, bus terminals)
- [ ] Other, please specify _________________________

| Rank 3 only
| Top first 3 revenue sources |
|-----------------------------|-----------------------------|

8. What kinds of services does your company provide? Please check all that apply and indicate (✓) which service involves the carrying or use of firearms by your security personnel.

<table>
<thead>
<tr>
<th>✓</th>
<th>Services</th>
<th>If service involves the carrying or use of firearms please ✓</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Armed Guarding</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Unarmed Guarding</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Guard dogs</td>
<td></td>
</tr>
<tr>
<td></td>
<td>IT /computer security and network protection</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Armoured cars</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Armed Escort</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Unarmed Escort</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cash-in-Transit/Money escort</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Merchandise-in-Transit</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Prisoner transfer</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Electronic Security Surveillance</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Vehicle patrol</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Alarm &amp; security systems installation, monitoring</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Private investigation/detectives</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Pre-employment screening</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Risk management consulting</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Security consulting</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Training Services</td>
<td></td>
</tr>
</tbody>
</table>
8.1. Which of these services provided by your company are the top three most in demand by your clients? Please rank 1(highest), 2 and 3 above.

9. In the next 3 to 5 years, what changes do you expect your company to experience in terms of:

9.1. the markets or client groups you serve? If so please explain

9.2. the types of services you provide? If so, please explain

A3: Personnel Qualifications and Training

10. How many persons are employed by your company? how many carry or use firearms in their work?

<table>
<thead>
<tr>
<th>Employees</th>
<th>Total Number</th>
<th>Total Carrying Firearms</th>
</tr>
</thead>
<tbody>
<tr>
<td>Both sexes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Female</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If actual numbers are not available please indicate estimated percentage.
11. What are the minimum entry requirements to work as a security guard in your company? Please provide details below as applicable to your company.

<table>
<thead>
<tr>
<th>Requirement with regard to:</th>
<th>If none please ✓</th>
<th>If applicable, please provide details of entry requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nationality</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Age</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Health status</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Police record check</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Education level</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Training</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other, specify</td>
<td>________________</td>
<td></td>
</tr>
</tbody>
</table>

12. Do your security guards undergo training when they are first employed?
   □ Yes       □ No

12.1. If yes, please provide details of the initial training (# of hours, content, who provides)
   __________________________________________________________________________
   __________________________________________________________________________
   __________________________________________________________________________
   __________________________________________________________________________

13. How many of your employees have completed the NVQ-J Level I certification (National Vocational Qualification of Jamaica Level One Standards in Security Operations)? ________________

14. Do male and female security personnel perform the same services (please check one)?
   □ Yes       □ No
14.1. If no, please list the types of work performed by female personnel

________________________________________________________________________

________________________________________________________________________

15. What is the starting salary for an entry level security guard in your company? 

16. When your security guards are on duty, are they required to:

   16.1. Wear a uniform? □ Yes □ No
   16.2. Carry a visible ID card? □ Yes □ No

SECTION B: FIREARM USE

THIS SECTION APPLIES ONLY TO COMPANIES WHICH PROVIDE SERVICES THAT REQUIRE SECURITY PERSONNEL TO CARRY FIREARMS. IF NONE OF YOUR SECURITY PERSONNEL CARRY FIREARMS, PLEASE PROCEED TO SECTION C.

17. How does your company determine its total weapons requirements? Is this done for individual units or contracts, or are requirements set company-wide?

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

18. What is the usual process that your company must go through to acquire firearms and ammunition for its use?

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________
19. From whom does your company purchase firearms and ammunition?

- [ ] From a local importer/broker
- [ ] Directly from a foreign supplier
- [ ] Other, please specify ________________________________

20. Are the firearms used by your personnel:

- [ ] Registered to the company? Go to Qs.21
- [ ] Other, please specify________
- [ ] Registered to individuals? Skip to Qs.23

21. IF FIREARMS ARE REGISTERED TO THE COMPANY, how are firearms deployed within the company? Are the firearms part of a common pool, shared and subject to overall oversight?

__________________________________________________________________
__________________________________________________________________
__________________________________________________________________

22. How does the company decide what type of weapon is carried or used by your security personnel?

- [ ] It depends on the type of service
- [ ] Always the same type of weapon is used

22.1. What are the criteria taken into account when deciding which weapon to use for a specific service?

__________________________________________________________________
__________________________________________________________________
__________________________________________________________________

__________________________________________________________________
23. What kinds of firearms do your security personnel normally use or have access to? (Check all that apply)

- [□] Pistols  - [□] Revolvers  - [□] Shotguns  - [□] Rifles
- [□] Semi-automatics  - [□] Other (please specify)______________________________

24. What kind of training must your security personnel undergo before they are able to carry firearms?

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

25. When security officers are not on duty, how are the firearms stored?

- [□] Stored on company premises, please specify how ________________________
- [□] Taken home by employees, please specify how ________________________
- [□] Other, please specify ________________________________________________

26. How does your company keep track of its firearms and ammunition inventory? What records are kept? Are these computerized or manual records? Do employees have to sign out and sign for firearms and ammunition that they carry while on duty? Please provide details.

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
27. What is your company’s procedure for firearms that are decommissioned or that are no longer needed in the service? How are they disposed of (e.g., sold, destroyed, donated etc.)?

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

28. What guidelines and procedures does your company have about the use of force by security personnel? Under what conditions can security personnel use firearms?

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

What problems have you experienced related to the management and use of firearms and ammunition among your security personnel? Check as many as applicable

☐ Poor or irregular record keeping of firearm use
☐ Improper or unsafe storage of firearms and ammunition
☐ Lost or stolen firearms and/or ammunition
☐ Loaning firearms to unauthorized users
☐ Carrying of unauthorized or unregistered weapons
☐ Misuse of firearms, unauthorized firing of weapons
☐ Others, specify __________________________________________________________

SECTION C: PUBLIC-PRIVATE COOPERATION, AFFILIATIONS

29. Does your company have members of the staff who were previously working with the Jamaica Constabulary Force (JCF) or the Jamaica Defense Force (JSF)?

☐ Yes how many _________ ☐ No
30. Are any of your company’s owners or members of the Board of Directors previously connected with the Jamaica Constabulary Force (JCF) or the Jamaica Defense Force (JSF)?

☐ Yes  how many _________  ☐ No

31. In the past year, how often have you hired off-duty JCF or JDF personnel to help with your work?

☐ Never  ☐ Sometimes (1-5x a year)  ☐ Often (more than 6x a year)

32. In the past year, how many times have you had contact with the police?

☐ Never  ☐ Sometimes (1-5x a year)  ☐ Often (more than 6x a year)

32.1. If you have had contact with the police, what was/were the reason(s) for the contact(s)? Please check as many as applicable.

☐ Alarm response  ☐ Handover/transport of suspects
☐ Conducting investigations  ☐ Sharing of information
☐ Loss of firearms  ☐ Other, please specify ______________________

33. Is there any formal co-operation or contract between your company and the police or other government Ministry?

☐ Yes  ☐ No

If yes, please elaborate:
________________________________________________________
______________________________________________________________________

SECTION D: VIEWS ON REGULATION

Kindly state your views about the following statements, by indicating with a ✓ under the appropriate column whether you:

1  Strongly Disagree  3 Undecided/Neutral  5 Strongly Agree
2  Disagree  4 Agree
### Questionnaire on Private Security Companies in Jamaica

<table>
<thead>
<tr>
<th></th>
<th>Strongly Disagree</th>
<th>Disagree</th>
<th>Undecided/Neutral</th>
<th>Agree</th>
<th>Strongly Agree</th>
</tr>
</thead>
<tbody>
<tr>
<td>34.</td>
<td>The Private Security Regulation Authority (PSRA) is able to handle approval of licenses and registrations in a timely manner.</td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
</tr>
<tr>
<td>35.</td>
<td>The PSRA is able to ensure that private security companies are operating within the rules and regulations prescribed by law.</td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
</tr>
<tr>
<td>36.</td>
<td>The PSRA is able to provide guidance in training of private security personnel</td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
</tr>
<tr>
<td>37.</td>
<td>The Firearms Licensing Authority is able to handle applications in a timely way</td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
</tr>
<tr>
<td>38.</td>
<td>There are some “bad apples” in the private security industry and the authorities are able to deal with them</td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
</tr>
<tr>
<td>39.</td>
<td>If private security companies agree to a Code of Conduct among themselves this will be an effective way of regulating the industry.</td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
<td><img src="#" alt="Table" /></td>
</tr>
</tbody>
</table>

40. What recommendations do you have for the effective operation of private security companies in Jamaica?

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

Thank you.
BACKGROUND INFORMATION OF RESPONDENTS

41. Name?

42. What is your current job and title?

43. How long have you been in this position?

44. What are your responsibilities?

SECTION A: PRIVATE SECURITY INDUSTRY TRENDS

1. Private security is a growth industry in Jamaica, when did you first notice the increase in the number of companies?

2. In your view, what factors have contributed to the growth of the private security industry in Jamaica?

What trends have you noticed in the private security industry in terms of the size or type of companies and their demand for firearms? For example, has there been an influx of foreign owned companies? What changes have occurred in the number and types of firearms private security companies (PSCs) have required?

SECTION B: LICENSING & REGISTRATION

1. What is your estimate of the percentage of unlicensed private security companies (PSCs) that operate in the country?

2. What is the average processing time from the time of submission of application to the PSRA to approval of the following?

<table>
<thead>
<tr>
<th>Type of Application to PSRA</th>
<th>Average duration it takes to process</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1. New license</td>
<td></td>
</tr>
<tr>
<td>2.2. License renewal</td>
<td></td>
</tr>
<tr>
<td>2.3. New registration</td>
<td></td>
</tr>
<tr>
<td>2.4. Registration renewal</td>
<td></td>
</tr>
</tbody>
</table>
3. Section 21 of the PSRA Act of 1992 states that the PSRA may issue a temporary license or registration pending its decision on an application? Under what conditions are temporary licenses or registrations issued? What is the duration of a temporary license or registration?

4. What insurance coverage is required for PSCs to be granted a license?

5. The license application process includes an inspection of proposed premises by the PSRA? Is the inspection mandatory for all applications (new and renewal) or is it only required on a case-by-case basis? What specific aspects/conditions are examined when the PSRA conducts an inspection?

SECTION C: ACQUISITION AND USE OF FIREARMS, TRAINING OF STAFF

6. Are there restrictions on the types of weapons private security companies (PSCs) can acquire? Can they acquire prohibited or restricted weapons? If yes, what types and under what conditions?

7. What types of firearms are most often used by PSCs (e.g., hand guns, pistols, revolvers, rifles, etc.)?

8. How do PSCs acquire weapons for company use? Are they restricted to acquiring weapons from local licensed firearms dealers or brokers? Or can PSCs apply for a firearm import permit and directly import weapons for company use?

9. In reviewing license applications/renewals, does the PSRA examine the total firearms stockpile of a company as to whether the total number and types of weapons licensed to a company is reasonable? Or is this determination left to the Firearm Licensing Authority when the PSCs apply for their Firearms Users License? If yes [PSRA examines firearms stockpiles], does the PSRA have standards to guide the determination whether the firearms stockpile of the company is reasonable? What are these standards?

10. What is the total number of firearms held by PSCs licensed by the PSRA?

11. What, if any, are the common problems you have found related to PSCs getting a license approved or renewed by the PSRA?

12. What is the total number of private security guards registered with the PSRA? (If you have statistics on this for the previous years we would also appreciate getting a copy.)

13. How many of the registered private security guards have completed the NVQ-J Level 1 certification?
14. What, if any, are the common problems you have found related to private security guards getting the required certification?

15. What kind of training does the PSRA require for private security guards who are authorized to carry firearms in the discharge of their duties?

16. What, if any, are the common problems you have found related to armed private security guards successfully completing training in firearms management and use?

17. What, if any, are the common problems you have found related to firearms management and use by PSCs?

18. The Firearms Licensing Authority currently has a backlog of applications to process, has this backlog affected the PSRA’s processing of license applications and renewals of PSCs? Has it affected the processing of registrations private security guards?

18.1. If yes, please explain how are these processes (licensing and registration) affected?

18.2. What measures are being taken or are planned to mitigate the situation?

SECTION D: GOVERNMENT MONITORING

1. After the PSRA has granted a license for a PSC to operate, does the PSRA have a responsibility to monitor the following in relation to PSCs? If not please indicate which other governmental body, if applicable, has responsibility for monitoring:

<table>
<thead>
<tr>
<th>Responsibility for monitoring:</th>
<th>No ✓</th>
<th>Yes ✓</th>
<th>How does the PSRA enforce or monitor this:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Firearms deployment and use</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Secure storage of firearms and ammunition by PSCs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Discharge of firearms in the course of duty</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Use of ammunition by PSCs, amount of ammunition expended</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Disposal of firearms decommissioned or no longer needed</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Recordkeeping by PSCs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Revocation of firearms licenses and certificates</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Others, please specify</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1.1. What kinds of records are required to be kept by licensees? (ASK if record keeping requirements are not apparent from responses to question #1?)
2. Can the PSRA make unannounced visits to inspect premises and records?

3. Are there areas where the oversight responsibilities of the FLA and PSRA are closely related or overlap? How is work between the two entities coordinated?

4. Has the PSRA revoked licenses of PSCs? What are the most common reasons for revocation of licenses granted to PSCs?

5. How would you rate the PSRA’s current capacity to enforce provisions of the PSRA Act? What are the current constraints faced by the PSRA in carrying out its mandate?

6. Do you have any recommendations on how the PSRA Act and supporting regulations can be strengthened?